

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF KANSAS**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civ. No. 13-02141-EFM-KGG
)	
UNIFIED GOVERNMENT OF)	
WYANDOTTE COUNTY AND)	
KANSAS CITY, KANSAS,)	
)	
and)	
)	
THE STATE OF KANSAS,)	
)	
Defendants.)	
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PARTIAL CONSENT DECREE

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INTRODUCTION

WHEREAS, Plaintiff, the United States of America ("United States"), by the authority of the Attorney General of the United States, acting at the request and on behalf of the Administrator of the United States Environmental Protection Agency ("EPA"), filed a Complaint alleging that Defendant, Unified Government of Wyandotte County and Kansas City, Kansas ("Unified Government"), violated the Clean Water Act, 33 U.S.C. § 1251, *et seq.* ("CWA" or "Act"), and seeking injunctive relief and civil penalties pursuant to Section 309(b) and (d) of the CWA, 33 U.S.C. § 1319(b) and (d).

WHEREAS, the Unified Government is a governmental entity organized and existing under the laws and constitution of the State of Kansas and a "municipality" pursuant to Section 502(4) of the CWA, 33 U.S.C. § 1362(4).

WHEREAS, the United States' Complaint also names the State of Kansas ("State") as a defendant in this action, thereby satisfying the requirements of Section 309(e) of the CWA, 33 U.S.C. § 1319(e).

WHEREAS, the State, through the Kansas Department of Health and Environment (“KDHE”), has been authorized by EPA to administer the National Pollutant Discharge Elimination System (“NPDES”) permit program, pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

WHEREAS, the Unified Government owns and operates a Publicly Owned Treatment Works (“POTW”) that includes wastewater collection, retention, transmission and treatment systems to collect and convey municipal sewage (domestic, commercial and industrial) to its wastewater treatment plants (“WWTPs”) or to its combined sewer overflow outfalls (“CSO Outfalls”), and is the holder of NPDES permits issued by KDHE authorizing the discharge of pollutants from certain outfalls.

WHEREAS, the Unified Government’s Sewer System consists of a combined sewer system (“CSS”) located within the eastern portion of Wyandotte County, and a separate sanitary sewer system (“SSS”) in the Unified Government’s jurisdiction in the remainder of Wyandotte County, with portions of the Sewer System in the primarily CSS area also consisting of some SSS lines.

WHEREAS, the Unified Government’s management of the CSS and discharges from CSO Outfalls are subject to the terms and conditions of an NPDES Permit No. KS0038563, issued for WWTP #1, also known as the Kaw Point WWTP, (hereafter, the “Kaw Point Permit”).

WHEREAS, the Unified Government prepared and submitted to KDHE a Long Term Control Plan (“LTCP”) in November 2000, pursuant to the requirements of the Kaw Point Permit, for continued operation and management of the CSS consistent with the requirements of the CWA.

WHEREAS, the Unified Government is required by the CWA, its implementing regulations and the Kaw Point Permit to implement the nine minimum controls (“NMCs”) for proper operation and maintenance of the CSS.

WHEREAS, in January 2007, EPA conducted an inspection to determine the Unified Government’s compliance with NPDES permit requirements for its Sewer System. Based on information developed by EPA during the inspection, EPA has identified various violations, including but not limited to, dry weather overflows from CSO Outfalls and discharges from the Sewer System at unauthorized locations. EPA has further determined, that the Unified Government’s LTCP, as presently drafted, is inadequate to comply with EPA’s 1994 CSO Policy (“CSO Policy”), adopted by reference into Section 402(q) of the CWA, 33 U.S.C. § 1342(q).

WHEREAS, in October 2009, EPA conducted an inspection of portions of the Unified Government’s collection system and the Kaw Point WWTP and WWTP #20 to evaluate the Unified Government’s compliance with NPDES permit requirements. EPA identified various alleged violations, including but not limited to, constructed SSOs, continued utilization of CSO Outfalls previously reported as abandoned by the Unified Government, and outfalls identified as CSO discharge points with little or no known stormwater contribution.

WHEREAS, this Partial Consent Decree requires the Unified Government to fully implement the NMCs and to develop and submit to EPA for review and approval, with a copy to the State, an Integrated Overflow Control Plan (“IOCP”), containing elements appropriate under the CSO Policy for a LTCP and plans for the continued improvement of its SSS.

WHEREAS, this Partial Consent Decree further requires the Unified Government to implement certain short-term construction projects and ongoing programmatic activities for the

Sewer System as set forth in Section VII. The Unified Government estimates that these projects will cost approximately \$20 million dollars.

WHEREAS, the Parties recognize that the work required by this Partial Consent Decree will not fully resolve the United States' claims alleged in the Complaint for either injunctive relief or civil penalties.

WHEREAS, the Unified Government owns and operates a Municipal Separate Storm Sewer System ("MS4") in the jurisdictional area of the Unified Government pursuant to NPDES Permit No. KS0095656 ("MS4 Permit"), issued by KDHE and effective January 2001 and most recently reissued and effective October 2007. The MS4 Permit authorizes discharges from the Unified Government's MS4, in accordance with specified conditions.

WHEREAS, in November 2007, EPA conducted a performance evaluation of the Unified Government's MS4 program. Based on information developed by EPA during the inspection, EPA has identified various violations by the Unified Government of its MS4 Permit.

WHEREAS, the Unified Government, in 2000, prepared and submitted a Stormwater Management Plan ("SWMP") to KDHE as a condition of being issued the 2001 MS4 Permit, and in October 2008, submitted a revised SWMP to KDHE as a condition of the reissued 2007 MS4 Permit. EPA and KDHE determined that the Unified Government's 2008 SWMP was inadequate to reduce the discharge of pollutants to the maximum extent practicable, as required by Section 402(p)(3)(B) of the CWA, 33 U.S.C. § 1342(p)(3)(B).

WHEREAS, the Unified Government, in 2012, prepared and submitted a SWMP to the EPA and KDHE to address the deficiencies identified in the Unified Government's previous SWMP submittal. KDHE conditionally approved the 2012 SWMP, attached hereto as Appendix

E, pending receipt and review of the Standard Operating Procedures (“SOPs”) to implement the SWMP, the final few of which are to be submitted pursuant to Section VI of this Consent Decree.

WHEREAS, this Consent Decree requires the Unified Government to implement its MS4 program in a manner consistent with its MS4 Permit through developing SOPs to implement the SWMP attached hereto as Appendix E, implementing its SWMP and the SOPs identified therein, and updating or revising its SWMP and the SOPs identified therein as may be required in a reissued MS4 Permit.

WHEREAS, the Parties to this Consent Decree have negotiated in good faith and have reached a partial settlement of the issues raised in the Complaint.

WHEREAS, the Unified Government does not admit any liability to the United States or State arising out of the transactions or occurrences alleged in the Complaint.

WHEREAS, the Parties agree, and the Court finds, that partial settlement of the claims alleged in the Complaint without further litigation or trial of any issues is fair, reasonable and in the public interest.

NOW THEREFORE, without the admission by the Unified Government of any of the non-jurisdictional allegations in the Complaint and this Consent Decree, and without adjudication of any fact or law, and with the Consent of the Parties, it is hereby ORDERED, ADJUDGED and DECREED as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331, 1345, and 1355; Section 309(b) of the CWA, 33 U.S.C. § 1319(b); and over the

Parties. Venue lies in this District pursuant to Sections 309(b) of the CWA, 33 U.S.C. § 1319(b); and pursuant to 28 U.S.C. § 1391(b) and 28 U.S.C. § 1395(a); because the Unified Government is located in this judicial district and the alleged violations, and a substantial part of the events or omissions giving rise to the claims, occurred in this judicial district. For purposes of this Decree or any action by the United States to enforce this Decree, the Unified Government consents to the Court's jurisdiction over this Decree or such action and over the Unified Government, and consents to venue in this judicial district.

2. The State of Kansas is a party to this Consent Decree, thereby satisfying the notice requirement pursuant to Section 309(b) of the Clean Water Act, 33 U.S.C. § 1319(b), and the requirement of Section 309(e) of the Act, 33 U.S.C. § 1319(e).

II. APPLICABILITY

3. The obligations of this Consent Decree apply to and are binding upon the United States and the Unified Government and any successor or other entities or persons otherwise bound by law.

4. The Unified Government shall provide effective notice to appropriate officers, employees, and agents whose duties include compliance with any provision of this Decree, including, the Mayor, the Unified Government Commission members and any contractor or consultant retained to perform Work required under this Consent Decree that a copy of this Consent Decree is posted on the Unified Government's intranet or internet site. The Unified Government shall be responsible for ensuring that all employees, contractors or consultants involved in performing any work pursuant to this Consent Decree perform such work in a manner consistent with the requirements of this Consent Decree. Any action taken by an entity

retained by the Unified Government to implement the Unified Government's duties under this Consent Decree shall be considered an action of the Unified Government for purposes of determining compliance with this Consent Decree. This Consent Decree shall not limit the Unified Government's rights to take all appropriate action against any such person or entity that causes or contributed to the Unified Government's act or failure to act.

5. Except as provided in Section XIV (Force Majeure), in any action by the United States to enforce this Consent Decree, the Unified Government shall not raise as a defense or excuse for noncompliance the failure by any of its officers, directors, the Unified Government Commission members, employees, agents, or contractors to take any actions necessary to comply with the provisions of this Consent Decree.

6. No transfer of ownership or operation of any of the facilities governed by this Decree, whether in compliance with this Section or otherwise, shall relieve the Unified Government of its obligation to ensure that the terms of the Decree are implemented, unless (a) the transferee agrees to be substituted for the Defendant as a Party under the Decree and thus be bound by the terms thereof and (b) the United States consents to relieve Defendant of its obligations. The decision to refuse or to approve the substitution of the transferee for the Defendant shall not be subject to judicial review. If the Unified Government proposes to sell or transfer part or all of its ownership or operation of any facilities governed by this Decree, it shall advise the purchaser or transferee in writing of the existence of this Consent Decree and provide a copy of the Consent Decree prior to such sale or transfer. The Unified Government shall send a copy of such written notification to the United States pursuant to Section XIX of this Decree (Notices) by certified mail, return receipt requested, at least forty-five (45) days before such sale

or transfer. Any attempt to transfer ownership or operation of any facility governed by this Decree without complying with this Paragraph constitutes a violation of this Decree.

III. OBJECTIVES

7. It is the express purpose of the Parties in entering this Consent Decree that the Unified Government use its best efforts to achieve the goals of: (a) full compliance with its NPDES permits, the CWA, the Kansas public health statutes, and their regulations; (b) compliance with the CSO Policy, including compliance with applicable state water quality standards; (c), the elimination of Sanitary Sewer System Overflows (“SSOs”) and Unauthorized CSOs; (d) the elimination of bypasses prohibited by 40 C.F.R. § 122.41(m); and (e) implementation of a SWMP that reduces the discharge of pollutants from the MS4 to the maximum extent practicable and requires implementation of measures to ensure compliance with the Unified Government’s MS4 Permit. The Unified Government shall maintain sufficient financial and personnel resources and sufficient equipment and analytical services to administer and implement the Work.

IV. DEFINITIONS

8. Unless otherwise provided in this Decree, terms used in this Consent Decree that are defined in the CWA, or in regulations promulgated pursuant to that Act, shall have the meanings assigned to them in the CWA, or such regulations. Whenever the terms set forth below are used in this Consent Decree, the following definitions shall apply:

“Adequate Capacity” shall mean the ability to collect, convey and treat peak wet weather flows, as identified in the approved IOCP.

“Asset Management” shall mean a structured approach to long-term management of assets as tools for the efficient and effective delivery of services, managing infrastructure capital assets to minimize the total cost of owning and operating them, and improving operational, environmental, and financial performance.

“Bypass” shall mean the intentional diversion of waste streams from any portion of a Wastewater Treatment Facility, as defined in 40 C.F.R. § 122.41(m). The Unified Government may request that an anticipated bypass be approved in accordance with 40 C.F.R. § 122.41(m)(4)(ii).

“Calendar Year” shall mean the twelve (12) month period starting on January 1 and ending on December 31.

“Capacity, Management, Operations, and Maintenance” or “CMOM” shall mean, for the purpose of this Consent Decree, a flexible program of accepted industry practices to properly manage, operate and maintain the Unified Government’s entire sanitary wastewater collection, transmission and treatment systems, respond to SSOs, and in conjunction with implementation of the IOCP, investigate and maintain and/or improve the system’s capacity.

“Capacity-Related” Sewer System discharge shall mean any unauthorized discharge or release from the City’s Separate Sewer System, such as an SSO, Unauthorized CSO or Private Property Backup, that is the result of the inability of that portion of the system or portions of the Separate Sewer System downstream of that portion, to convey or treat flows experienced within that portion of the Separate Sewer System, and where that inability is not primarily maintenance related (e.g., the result of a temporary blockage).

“Certification” or “certify” when used in this Consent Decree shall require the Unified Government to comply with Section XII of this Consent Decree.

“Clean Water Act” or “CWA” or “Act” shall mean the Clean Water Act, formally entitled the Federal Water Pollution Control Act, as amended, 33 U.S.C. § 1251, *et seq.*

“Combined Sewer System” or “CSS” shall mean the portions of the Unified Government’s Sewer System which convey sanitary wastewaters (domestic, commercial and industrial wastewaters) and storm water through a single-pipe system to a POTW Treatment Plant (as defined in 40 § CFR 403.3(r)) or an authorized CSO Outfall.

“Combined Sewer Overflow” or “CSO” shall mean any discharge from the CSS at a point prior to the POTW Treatment Plant.

“Combined Sewer Overflow Outfall” or “CSO Outfall” shall mean the outfalls from which CSOs are authorized at the time of the discharge as identified in Appendix D to this Consent Decree, or that may be identified and authorized pursuant to a future issued Kaw Point Permit to discharge to waters of the United States or the State.

“Consent Decree” or “Decree” shall mean this Partial Consent Decree or the Final Consent Decree and all their appendices. In the event of a conflict between this document and any appendices, this document shall control.

“Date of Lodging” shall mean the date on which this Decree is lodged by the United States with the United States District Court for the District of Kansas for a period of public comment.

“Day” or “days” (whether or not capitalized) shall mean a calendar day or calendar days, unless expressly stated otherwise. In computing due dates under this Consent

Decree, where the last day would fall on a Saturday, Sunday, or federal holiday, the period shall run until the close of business – 5:00 pm Central Time – of the next working day.

“Defendants” shall mean the Unified Government of Wyandotte County and Kansas City, Kansas, the State of Kansas, and any successors thereto.

“Design Year” shall mean a theoretical long term median rainfall distribution pattern that shall be used to model the CSS to determine current system performance and the effectiveness of CSO control alternatives. The Design Year shall be developed based on an evaluation of historical rainfall and precipitation event characteristics.

“Deliverable” shall mean any written document or other work product, whether in hard copy or electronic format, required to be prepared and/or submitted by or on behalf of the Unified Government pursuant to this Decree.

“EPA” shall mean the United States Environmental Protection Agency, including any successor departments or agencies of the United States.

“Excessive Infiltration/ Inflow” or “Excessive I/I” shall have the meaning set forth in the definition at 40 C.F.R. § 35.2005(b)(16).

“Force Main” shall mean all Sewer System lines that operate under pressure due to pumping of wastewater at a pump station except for those Sewer System lines that serve a single structure or building.

“Green Infrastructure” shall mean, for purposes of this Consent Decree, the range of stormwater control measures that use plant/soil systems, permeable pavement, or stormwater harvest and reuse, to store, infiltrate, or evapotranspire stormwater and reduce flows to the

Sewer System. Green Infrastructure may include, but is not limited to, bioretention and extended detention wetland areas as well as green roofs and cisterns.

“Gravity Sewer Line” shall mean a pipe within the Sewer System that receives, contains and conveys wastewater not normally under pressure, but is intended to flow unassisted under the influence of gravity.

“Industrial Facility” shall mean any facility located within the MS4 jurisdictional limits of the Unified Government from which there is a “stormwater discharge associated with industrial activity,” as defined in 40 C.F.R. § 122.26(b)(14)(x).

“Industrial User” shall mean a non-domestic discharger to the Unified Government’s Sewer System, as that term is defined by Section 502(18) of the CWA, 33 U.S.C. § 1362(18), and 40 C.F.R. § 403.3(j).

“I/I” shall mean the total quantity of water from Infiltration and Inflow without distinguishing the source.

“Infiltration” shall mean water other than wastewater that enters the Sewer System, as defined by 40 C.F.R. § 35.2005(b)(20) .

“Inflow” shall mean water other than wastewater that enters the Sewer System, as defined by 40 C.F.R. § 35.2005(b)(21).

“Information Management System” or “IMS” shall mean a system designed and implemented in a manner to efficiently and effectively collect, retain and utilize information and data, including information necessary to implement effective Asset Management, regarding the Unified Government’s MS4, Sewer System and Wastewater Treatment Plants.

“Kansas public health statutes” shall mean the Kansas public health statutes as provided in Kansas Statutes Annotated (“K.S.A.”) 65-161 *et seq.*, and the regulations promulgated pursuant thereto.

“KDHE” shall mean the Kansas Department of Health and Environment of the State of Kansas, or its successor.

“Level of Service” shall mean a measure to determine the effectiveness of elements of the Sewer System in eliminating SSOs for a rainfall or flow event with a specified recurrence interval.

“Maximum Extent Practicable” shall mean the standard of performance for MS4 programs as described in Section 402(p) of the CWA, and regulations promulgated thereunder at 40 C.F.R. § 122.26.

“MS4” shall mean the Unified Government’s municipal separate storm sewer system, as that term is defined in 40 C.F.R. § 122.26(b)(8).

“MS4 Permit” shall mean NPDES Permit No. KS0095656 (“MS4 Permit”), with an effective date of October 1, 2007, and any subsequently issued permit, which authorizes discharges from the Unified Government’s MS4 in accordance with conditions specified therein.

“NPDES” shall mean National Pollutant Discharge Elimination System, as established by 33 U.S.C. § 1342.

“NPDES Permit” shall mean the most recently issued NPDES permits issued to the Unified Government for the WWTPs and the MS4 Permit. The current permits as of the Date of Lodging are listed in Appendix A.

“Paragraph” shall mean a portion of this Consent Decree identified by an Arabic numeral.

“Parties” shall mean the parties to this Consent Decree: the United States, the State, and the Unified Government.

“Private Lateral” shall mean that portion of the Sewer System not owned by the Unified Government used to convey wastewater from a building or buildings to that portion of the Sewer System owned by the Unified Government. Private Laterals include connector joints at the Unified Government’s sewer line.

“Private Property Backup” shall mean any release of wastewater from the Unified Government’s Sewer System to buildings or private property that occurs when a wastewater backup occurs into a building and is caused by blockages, flow conditions, or other conditions in the Sewer System. For purposes of this Consent Decree a wastewater backup that is caused solely by conditions in a Private Lateral is not a Private Property Backup.

“Pumping Station” or “pump station” as used within this Consent Decree shall mean facilities owned or operated by the Unified Government comprised of pumps that lift wastewater to a higher hydraulic elevation or increase the flow rate/volume through the collection system, including all related electrical, mechanical and structural systems necessary to the operation of that pump station. The term Pumping Station shall also apply to facilities referred to as a lift station.

“Sanitary Sewer Overflow” or “SSO” shall mean, for purposes of this Consent Decree, an overflow, spill, diversion, or release of wastewater from or caused by the Unified Government’s SSS. This term shall include discharges to the waters of the United States from

the City's SSS, as well as any release of wastewater from the City's SSS to public or private property that does not reach waters of the United States, including Private Property Backups. SSOs do not include temporary rerouting of one portion of the SSS or CSS to another portion thereof during collection system repairs.

“Sanitary Sewer System” or “SSS” shall mean the wastewater collection, retention, and transmission systems owned or operated by the Unified Government designed to collect and convey municipal sewage (domestic, commercial and industrial), and not stormwater, to a WWTP.

“Section” shall mean a portion of this Decree identified by an uppercase Roman numeral.

“Sewershed” shall mean a section of the Unified Government's Sewer System that is a distinct drainage or wastewater collection area and designated as such by the Unified Government. For purposes of this Consent Decree, the Sewersheds are identified in Appendix B to this Consent Decree.

“Sewer System” shall mean the municipal sanitary wastewater collection and transmission systems, whether serving CSS or SSS areas, including all pipes, force mains, gravity sewer lines, lift stations, pumping stations, manholes and appurtenances thereto, which are owned or operated by the Unified Government.

“State” shall mean the State of Kansas acting through the Kansas Department of Health and Environment.

“Stormwater Management Program” or “SWMP” shall mean the Unified Government's program to manage municipal stormwater.

“Unauthorized CSO” shall mean for purposes of this Consent Decree, any overflow, spill, diversion, or release of wastewater within the CSS at a location other than an authorized CSO Outfall, as defined herein, that is from or caused by the Unified Government’s Sewer System. This term shall include discharges to the waters of the United States from the City’s CSS at an unauthorized CSO Outfall, as well as any release of wastewater from the City’s CSS to public or private property that does not reach waters of the United States, including Private Property Backups.

“United States” shall mean the United States of America, acting on behalf of EPA.

“Unpermitted Bypass” shall mean any Bypass from a WWTP that constitutes a prohibited bypass as defined in 40 C.F.R. § 122.41(m).

“Wastewater Treatment Plant” or “WWTP” shall mean any devices or systems used in the storage, treatment, and reclamation of municipal wastewater. For the purposes of this Consent Decree, this definition shall include all such facilities owned, managed, operated and/or maintained by the Unified Government, including the facilities for which NPDES permits are identified in Appendix A to this Consent Decree.

“Work” shall mean all activities the Unified Government is required to perform under this Consent Decree.

V. INFORMATION MANAGEMENT SYSTEM

9. No later than September 30, 2013, the Unified Government shall submit to EPA, for review and comment, an Information Management Gap Analysis (“IMGA”) and Information Management System (“IMS”) Program Plan. The IMGA will include an inventory and

assessment of existing information management elements, and an assessment of the needed components to ensure all necessary information and data related to identification, tracking, operation, maintenance, management, assets and planning for the Unified Government's wastewater and stormwater programs are consistently, efficiently and effectively managed. The IMS Program Plan shall include a framework and schedule for considering and implementing alternatives to address information and asset management gaps identified in the IMGGA, as described in Paragraph 10, below. If EPA provides comments on the IMGGA and/or IMS Program Plan within thirty (30) days of the Unified Government's submittal, the Unified Government may, within thirty (30) days after receipt of such comments, revise the IMGGA and/or IMS Program Plan to address the comments and resubmit it/them to EPA.

10. The IMS shall include the capacity to track significant activities and deadlines pursuant to applicable WWTP and MS4 permits and in plans under this Consent Decree, including but not limited to: the SWMP; the Nine Minimum Control Plan; the Fats, Oils and Grease Control Program Plan; the Collection System Release Response Plan; the Capacity, Maintenance, Operation and Management Program Plan; and the IOCP.

VI. COMPLIANCE MEASURES RELATING TO STORM SEWER SYSTEM

11. SWMP Implementation. Except to the extent certain SOPs are addressed by Paragraph 12, below, the Unified Government shall implement the SWMP, incorporated into the Consent Decree and attached hereto as Appendix E, and the SOPs identified therein immediately upon the Date of Lodging in a manner that meets the requirements of the Unified Government's MS4 Permit. If the Unified Government makes revisions to the SWMP and/or its SOP(s), other than minor corrections or adjustments, the Unified Government shall submit such revised

provisions to the EPA for review, with a copy to the State, in the Annual or Semiannual Report, pursuant to Paragraph 60(b)(v). Such revisions shall not be considered modifications to the Consent Decree for purposes of Section XXII of this Consent Decree (Modification).

12. Standard Operating Procedures. The Unified Government shall provide to EPA, for review and comment, with a copy to the State, the SOPs listed below in Subparagraphs (a) through (c) to implement the SWMP. If EPA, after consultation with the State, provides comments on any such SOP within thirty (30) days of Unified Government's submittal of that SOP, the Unified Government may, within thirty (30) days after receipt of such comments, revise the SOP to address the comments and submit the revised SOP to EPA. The Unified Government shall by no later than March 31, 2013, submit to EPA, with a copy to the State, the following SOPs:

- (a) SWMP Section 7.A.1 (Plan Review SOP);
- (b) SWMP Section 7.A.2 (Inspection SOP); and
- (c) SWMP Section 7.A.3 (Enforcement SOP).

13. Within thirty (30) days following the review and comment process described in Paragraph 12 above, the Unified Government shall implement the procedures in each such SOP in a manner that meets the requirements of the Unified Government's MS4 permit.

14. Legal Authority. By June 30, 2014, and to the extent provided under applicable law, the Unified Government shall certify that it has adopted and will maintain ordinances that:

- (a) Confer authority on the Unified Government to perform inspections necessary and appropriate to administer the Illicit Discharge Program, Industrial Stormwater

Management Program, Construction Site Stormwater Management Program, and Post-Construction Stormwater Management Program.

(b) Confer authority on the Unified Government to assess penalties for violation of any Illicit Discharge Program, Industrial Stormwater Management Program, Construction Site Stormwater Management Program, and Post-Construction Stormwater Management Program requirement.

(c) Confer authority on the Unified Government to issue enforceable orders compelling the elimination of any Illicit Connections to its MS4 or the elimination of illicit discharges, and as appropriate, recuperate costs from responsible parties that fail to eliminate discharges within a reasonable time following demand for cessation of discharge.

(d) Confer authority on the Unified Government to issue stop-work orders, where appropriate, compelling the cessation of construction activity at any Active Construction Site (a site requiring construction stormwater permit from KDHE where construction activity is ongoing) and to issue injunctions to prohibit construction activities, when appropriate, until corrections are made at any Inactive Construction Site (a site requiring a construction stormwater permit from KDHE that has not yet reached final stabilization and/or does not meet the requirements to terminate the permit) that is in violation of any of the Unified Government ordinances relating to stormwater management at Active and Inactive Construction Sites.

(e) Confer authority on the Unified Government consistent with 40 C.F.R. § 122.26(d)(2)(iv)(C) to require Industrial Facilities and High-Risk Commercial Facilities, as described therein, and within the area served by the MS4, to address any discharges to the MS4, to install or undertake stormwater control measures on their properties and, if otherwise required

by federal or State law, to conduct monitoring and provide the monitoring results to the Unified Government.

(f) Confer authority on the Unified Government to require owners of privately-owned retention and detention basins and other privately-owned stormwater control structures associated with new development or significant redevelopment, within the area served by the MS4, following entry of this Consent Decree to perform necessary maintenance and repairs on such structures and authorize the issuance of schedules for compliance and the assessment of penalties to compel such maintenance and repairs.

15. Funding. Beginning with its first fiscal year after the Effective Date of this Consent Decree, the Unified Government shall ensure there is adequate funding for each operating year in an amount reasonably expected to be sufficient to implement all measures in the SWMP, comply with the MS4 Permit, and comply with all the requirements of this Section of the Consent Decree (Compliance Measures Relating to Storm Sewer System). The Unified Government shall include in the Annual Report for each year, pursuant to Section XII, information regarding its SWMP implementation budget.

16. Personnel and Training. The Unified Government shall maintain adequate personnel and/or retain sufficient contractors to comply with this Section of this Consent Decree. The Unified Government shall, consistent with the provisions of the SWMP, attached hereto as Appendix E, and relevant SOPs, ensure that all personnel with responsibilities for compliance with this Section of this Consent Decree receive necessary and appropriate training to carry out their obligations for MS4 program implementation.

VII. ONGOING CONSTRUCTION AND PROGRAMMATIC ACTIVITIES FOR THE SEWER SYSTEM

A. Construction of Improvements at the Kaw Point WWTP.

17. The Unified Government shall complete the following projects pursuant to the schedules listed below for each project. The Unified Government shall include in each Annual Report, pursuant to Section XII, information regarding its efforts to comply with this Paragraph.

(a) **Design and Construct a 48 Million Gallons Per Day UV Disinfection Facility.** The Unified Government shall design and construct a 48 million gallons per day (“MGD”) ultra violet disinfection facility at the Kaw Point WWTP. Construction and start-up shall be completed by September 30, 2015.

(b) **Solids Dewatering Improvements at Kaw Point WWTP.** The Unified Government shall design, construct and begin operations of solids dewatering improvements at the Kaw Point WWTP no later than December 31, 2016, that will produce sludge residuals suitable for landfilling in accordance with 40 C.F.R. Part 503. The Unified Government is constructing the solids dewatering facilities to replace sludge handling after abandonment of the Kaw Point sewage sludge incinerators.

B. Construction of Improvements in the SSS and CSS Service Areas.

18. The Unified Government shall complete the following projects pursuant to the schedules listed below for each project. Unless otherwise indicated herein, the Unified Government shall include in each Annual Report, pursuant to Section XII, information regarding its efforts to comply with each of the projects identified in this Paragraph.

(a) **Investigation and Elimination of Specific CSOs:**

(i) **Closure of CSO 82 and Manhole 064-146 (11th and Troup).**

The Unified Government shall conduct an analysis of alternatives for closure of this constructed overflow. The analysis and closure of the overflow shall be completed by Dec. 31, 2013, and reported in the February 15, 2014 Annual Report, pursuant to Section XII.

(ii) **Investigation of CSOs 20, 34-38, 46, 68, and 83.** The Unified Government shall conduct an investigation of CSOs 20, 34-38, 46, 68, and 83, using smoke testing or other means to determine stormwater inputs or connection to the CSS. The Unified Government shall also survey and provide a condition assessment of approximately 130 manholes and a physical survey of the 10 outfalls and diversion structures in the Central Industrial District area. The Unified Government shall submit a report of the investigation in the February 15, 2014 Annual Report, pursuant to Section XII, which shall:

(A) confirm that the CSOs receive stormwater inputs, or if no stormwater input is identified reclassify the CSOs as constructed SSOs; and

(B) evaluate the feasibility of plugging any of the CSOs that were reclassified as constructed SSOs. Where technically feasible and without risk of adverse impacts elsewhere in the system, the Unified Government shall provide a schedule to plug or otherwise eliminate such constructed SSOs by September 30, 2016. If the Unified Government determines that plugging or otherwise eliminating any of the reclassified constructed SSOs is not feasible by September 30, 2016, the Unified Government shall address those SSOs as part of the IOCP.

(b) **North Jersey Creek Sewer System Repairs 12th Street to 18th Street.**

The Unified Government shall repair and rehabilitate clay pipe and brick or stone manholes in the area of North Jersey Creek which is generally bounded by N. 12th St. on the East, N. 17th St. on the West, Parallel Ave. on the South and Quindaro Ave. on the North. The scope of the work includes repair and rehabilitation of clay pipe and brick or stone manholes in the combined sewer system. Rehabilitation of pipes will include approximately 9,000 lineal feet of cured in place pipe (“CIPP”) lining and spot repair of approximately 25 additional pipe segments. Manhole rehabilitation will include cementitious lining of approximately 1,000 vertical feet of manhole wall and cone and replacement of approximately 50 frames and covers. Implementation of all repairs and rehabilitation work shall be completed no later than December 31, 2013.

(c) **CSO Structure Study and Minor Modifications.** The Unified

Government shall conduct an evaluation including a desktop study and field review of all CSO diversion structures to evaluate whether minor structural modifications can be made to enhance system capacity while the IOCP is being developed and implemented. Modifications, such as weir height adjustment, will be constructed if determined to be beneficial and feasible (technically and avoiding adverse impacts elsewhere in the system). The CSO Structure Study, analyzing each diversion structure, shall be submitted as part of the February 15, 2015 Annual Report pursuant to Section XII. The modifications determined beneficial and feasible shall be completed no later than December 31, 2016.

(d) **67th & Parallel - Aerial Sanitary Sewer Line Stabilization.** The

Unified Government shall investigate, design and construct stabilization to stream banks as

necessary to stabilize and protect the aerial sewer support structures at 67th Street and Parallel Parkway. Construction shall be completed no later than March 30, 2014.

(e) **SSS Pump Station Repair and Rehabilitation Evaluation.** The Unified Government shall evaluate all pump stations in the SSS to identify the physical condition of each Pumping Station, including individual pump capacity, station firm capacity and stand-by power, to determine their condition, reliability and capacity. The evaluation will provide the basis for prioritizing repair and rehabilitation activities including integration with IOCP planning and implementation. The goal of the repair and rehabilitation work is to improve pump station condition and reliability and thereby reduce the potential for mechanical and/or electrical failure-related sewer overflows. The evaluation for the first 34 pump stations within the SSS will be completed according to the criteria set forth in Subparagraph (i) below, and compiled into a summary report and schedule for repair to be submitted to EPA, with a copy to the State, no later than June 30, 2013. The remaining 30 pump stations in the SSS will be evaluated according to the criteria set forth in Subparagraph (i) below, and compiled into a summary report and schedule for repair to be submitted to EPA, with a copy to the State, no later than June 30, 2014. The Unified Government shall commit to spending at least \$700,000 on an annual average basis for five years from the date of entry of the Consent Decree to implement the highest priority pump station repairs identified in the evaluation. The Unified Government shall include in each Annual Report submitted pursuant to Paragraph 60(c)(ii), a list and brief description of all pump station repairs implemented pursuant to this Paragraph during the reporting year and the costs associated with those repairs. Any additional pump station repairs identified in the evaluation that are not completed pursuant to the above shall be addressed in the approved IOCP and/or

scheduled for completion as part of Capacity, Management, Operations, and Maintenance Program Plan implementation, as addressed by Subsection G, below.

(i) The Pump Station evaluation criteria shall include, but not be limited to criteria for when a pump station must be repaired or rehabilitated, identification of firm pump capacity, provisions for alternate power, general physical condition, and existing/planned supervisory control and data acquisition (“SCADA”). For pump stations of 1,000 gallons per minute (“gpm”) firm capacity or more, the evaluation shall also include field-development of the pumping system head curves.

(f) **Stream Crossing Inspection.** The Unified Government shall conduct a field inspection to locate exposed pipelines and immediately adjacent structures that are at risk due to stream bank erosion. Findings of the inspection will be used for planning and budgeting for future corrective action. The inspection shall be completed and the results compiled into a summary report, including a preliminary schedule for repairs, submitted to EPA, with a copy to the State, no later than December 31, 2013. The preliminary schedule will be finalized through the subsequent Unified Government budgeting and planning process. The Unified Government shall correct all defects and/or make repairs identified by the inspection by September 30, 2016 or include the project in the IOCP. The Unified Government shall include in each Annual Report, pursuant to Section XII, information regarding activities to comply with this Paragraph.

(g) **Brush Creek Service Area.** The Unified Government shall make interim repairs or replace Pump Station 37 to enhance its capacity and reliability and reduce potential overflows until such time as the remedial measures for Brush Creek Service Area identified in the IOCP are implemented. Repairs or replacement of Pump Station 37 shall be completed by

December 31, 2014. The Unified Government will confirm completion of the repairs or replacement of Pump Station 37 in the February 15, 2015, Annual Report, pursuant to Section XII.

C. Fats, Oil and Grease Control Program Plan

19. The Unified Government shall implement the Fats, Oil and Grease (“FOG”) Control Program Plan, incorporated into the Consent Decree and attached hereto as Appendix F, to reduce the potential for grease accumulations which may impact Sewer System capacity and contribute to Sewer System Overflows. The FOG Control Program Plan includes an implementation schedule for the various aspects of the Plan.

20. No later than July 1, 2014, the Unified Government shall report and certify to EPA, in accordance with Section XII, that it has adopted appropriate legal authority to administer its FOG Control Program, attached to this Consent Decree as Appendix F, and that the FOG Control Program Plan is being fully implemented in accordance with the schedule, therein.

21. The Unified Government shall periodically review and update the FOG Control Program Plan and the associated SOPs, as necessary, to ensure effective and efficient implementation of the FOG Control Program. If the Unified Government makes revisions to the FOG Control Program Plan and/or its SOP(s), other than minor corrections or adjustments, the Unified Government shall submit such revised provisions to the EPA for review, with a copy to the State. Such revisions shall not be considered modifications to the Consent Decree for purposes of Section XXII of this Consent Decree (Modification).

22. The Unified Government shall include in the Annual Report each year, pursuant to Section XII, information regarding implementation of the FOG Program Plan.

D. Collection System Release Response Plan

23. The Unified Government shall implement the Collection System Release Response Plan (“CSRRP”) incorporated into the Consent Decree and attached hereto as Appendix G.

24. The Unified Government shall periodically review and update the CSRRP and the incorporated SOPs, as necessary, to ensure effective and efficient implementation of the CSRRP. If the Unified Government makes revisions to the CSRRP and/or its SOP(s), other than minor corrections or adjustments, the Unified Government shall submit such revised provisions to the EPA for review, with a copy to the State, in the Annual or Semiannual Report, pursuant to Paragraph 60(b)(v). Such revisions shall not be considered modifications to the Consent Decree for purposes of Section XXII of this Consent Decree (Modification).

E. Abandonment of Sewer Services Program and New Sewer Construction

25. The Unified Government shall evaluate its legal authority regarding abandonment of sanitary sewer services to assess whether it is sufficient to effectively reduce ongoing excessive I/I following abandonment of sewer services. If determined appropriate based on the above evaluation, the Unified Government shall revise its legal authority. The evaluation shall focus on ensuring that the lateral sewer lines will be plugged at the connection point to the Unified Government-owned main, where feasible. The Unified Government shall provide a copy of the ordinance or other legal authority and any recommended changes thereto, together with a schedule for adopting such changes, to EPA in the 2014 Annual Report.

26. The Unified Government shall enforce its Sewer Ordinance (Ord. No. O-46-05, § 1, 6-2-2005; Sewer Use Ordinance Chapter 30, Article V, Section 30-122) as to new

construction in order to prohibit discharges of stormwater, surface waters, ground waters, roof runoff, cooling water, and Excessive I/I to the Sewer System.

F. Nine Minimum Controls Plan for the Combined Sewer System

27. The Unified Government shall implement the Nine Minimum Controls Plan (“NMCP”) incorporated into the Consent Decree and attached hereto as Appendix H.

28. The Unified Government shall periodically review and update the NMCP, as necessary, to ensure effective and efficient implementation of the NMCP. If the Unified Government makes revisions to the NMCP, other than minor corrections or adjustments, the Unified Government shall submit such revised provisions to the EPA for review, with a copy to the State, in the Annual or Semiannual Report, pursuant to Paragraph 60(b)(v). Such revisions shall not be considered modifications to the Consent Decree for purposes of Section XXII of this Consent Decree (Modification).

G. Capacity, Management, Operations, and Maintenance Program Plan

29. The Unified Government shall submit by December 31, 2013, for review and approval by EPA in accordance with the requirements of Section XII, with a copy to the State, a comprehensive Capacity, Management, Operations, and Maintenance (“CMOM”) Program Plan with a proposed implementation schedule. The CMOM Program Plan and other submittals shall be based on good engineering practices and in accordance with accepted industry standards, using the following documents as guidance, as applicable: (a) EPA’s Handbook: Sewer System Infrastructure Analysis and Rehabilitation, EPA/625/6-91/030, 1991 (hereafter “EPA Handbook”); (b) National Association of Sewer Service Companies Sewerage Rehabilitation Manual; and (c) Water Environment Federation Manual of Practice FD-6 – Existing Sewer

Evaluation and Rehabilitation, Third Edition. The CMOM Program Plan shall incorporate the following elements: statement of program goal; establishment of performance goals; organizational structure and communication; legal authority; training; maintenance activities for gravity sewers, interceptors, public laterals, pump stations and force mains; and design construction and testing standards for new and rehabilitated gravity sewers, force mains and manholes. Until such time as the CMOM Program Plan may be modified to conform to the approved IOCP, the CMOM Program Plan shall establish maintenance, inspection, and rehabilitation/replacement levels in a manner designed to maintain the existing level of wet weather capacity service. The CMOM Program Plan shall describe:

- (a) Standard procedures for documentation of:
 - (i) Customer complaints and response thereto;
 - (ii) Work order tracking and management; and
 - (iii) Updates to sewer system inventory and mapping.
- (b) Preventive and routine maintenance procedures for cleaning and closed-circuit television (“CCTV”) inspection of gravity lines.
- (c) Routine inspection and maintenance procedures for pump stations, including standard procedures for inspections and maintenance.
- (d) Routine inspection and maintenance procedures for force mains, including standard procedures for assessment and maintenance.
- (e) Integration of the Unified Government’s ongoing operation, maintenance and response programs, including but not limited to the FOG Control Program, the CSRRP and a root control program.

30. The CMOM Program Plan shall include a section on a capacity assurance plan that will be implemented to maintain capacity following the correction of capacity issues identified and rectified as a result of implementation of the IOCP. The CMOM Program Plan shall also include a section on capacity evaluation for future changes to the Sewer System relating to continued system aging (e.g., increasing I/I) and system growth not envisioned or considered in the IOCP.

31. Until such time as the CMOM Program may be modified to conform to the approved IOCP, the Unified Government shall implement the CMOM Program in a manner designed to maintain the existing level of wet weather capacity service. The Unified Government shall:

(a) Inspect Gravity Sewer Lines:

(i) The Unified Government shall:

(A) conduct an internal inspection of (1) each section of Gravity Sewer pipe that experiences a non-capacity related SSO, and (2) as appropriate, conduct any upstream and/or downstream sections, using CCTV or other appropriate inspection methods (excluding lamping) as soon as is practicable following the resolution of the non-capacity related SSO but not longer than 30 days after the non-capacity related SSO was resolved; and

(B) perform an appropriate inspection no more than 90 days following any permanent repair, rehabilitation, and/or replacement of sewer pipes;

(ii) In addition to the incident-based inspections addressed by Subparagraph (i) above, the Unified Government shall CCTV at least 40 miles of sewer pipe per year, of which at least 28 miles shall be unique. CCTV general priority shall be based on pipe

age, pipe material, and maintenance history and shall include sewers that have experienced non-capacity related SSOs, blockages and/or structural failures. Subject to the requirement that at least 28 unique miles of pipe televised are unique, the Unified Government may include pipe segments that are televised more than one time in the total annual miles of pipe that are televised; and

(iii) The Unified Government shall maintain a data retrieval storage system that allows access to inspection reports and video of sewer pipes.

(b) Clean Gravity Sewer Lines:

(i) The Unified Government shall clean 200 miles of its gravity sewer lines within its collection system annually, of which at least 140 miles shall be unique;

(ii) The Unified Government shall maintain retrievable data records to indicate the location and lengths of gravity sewer cleaned and describing the techniques used to clean each sewer segment. The acquired data shall be used to inform the need for additional CCTV inspections and increased cleaning cycles.

(c) Inspect, repair, rehabilitate, and replace certain Sewer System manholes:

(i) The Unified Government shall inspect no less than 1,000 manholes annually. Inspection shall include the evaluation of manhole frame-to-adjustment ring-to-manhole-barrel seals in its Sanitary Sewer System; and

(ii) The Unified Government shall repair, rehabilitate, and/or replace at least 250 manholes per year on a 3-year rolling annual average.

(d) Rehabilitate, repair and/or replace certain sewer pipes:

(i) The Unified Government shall budget for and permanently repair, rehabilitate, and/or replace sewer pipe in the Sewer System annually based on current CCTV records, pipe age, and material and maintenance history;

(ii) The Unified Government shall repair known defects (i.e., those defects that have caused or increase the risk of a non-capacity related SSO, including conditions leading to structural collapse or that would create blockages) as soon as is practical. The Unified Government shall maintain a log listing discovered sewer line defects in need of expeditious repair or replacement, the date the Unified Government discovered the defect, and the date of project completion.

(e) Implement a routine and preventative maintenance program for Pump Stations:

(i) The Unified Government shall conduct visual inspections no less than monthly for all Pump Stations, no less than twice per month for pump stations between 1 MGD to 5 MGD in peak hydraulic capacity, and no less than weekly for pump stations greater than 5 MGD in peak hydraulic capacity; and

(ii) The Unified Government shall use SCADA to continuously monitor station performance at stations so equipped. The remaining pump stations shall be monitored through dialer alarm systems reporting high wet wells, power failure, pump failures and phase loss.

(f) Implement a corrective and emergency Pump Station response program as identified in the CSRRP:

(i) The Unified Government shall create and maintain a list of backup portable pumping equipment and portable generators available for Pump Stations that rely on redundant storage only to prevent overflows during periods of pumping equipment malfunction or primary power outage.

(g) Inspect and repair of Force Mains:

(i) The Unified Government shall develop and implement an SOP for inspection and repair of Force Mains, incorporating the following:

- (A) if warranted, evaluation of nondestructive inspection techniques;
- (B) inspection of air and vacuum release valves (“ARVs”);
- (C) inspection of force main discharge points for evidence of corrosion; and
- (D) periodic review of force main age, construction material and maintenance history; and

(ii) The Unified Government shall repair all defects within one (1) year of discovery, unless impracticable. If unable to complete a repair of such a defect within one year of discovery, the Unified Government will submit a schedule for repair of the defect.

32. CMOM Program Plan Implementation: The Unified Government shall implement the approved CMOM Program Plan in accordance with the schedule provided in Paragraph 29. After approval of the CMOM Program Plan as described in Paragraph 29, the Unified Government shall annually review its CMOM Program Plan and update the program as necessary to ensure that the program is achieving the service levels contained in the approved

IOCP Plan. If the Unified Government makes revisions to the approved CMOM Program Plan, other than minor corrections or adjustments, the Unified Government shall submit such revised provisions to the EPA for review, with a copy to the State, in the Annual or Semiannual Report, pursuant to Paragraph 60(b)(v). Such revisions shall not be considered modifications to the Consent Decree for purposes of Section XXII of this Consent Decree (Modification).

33. Until approval of the IOCP, the Unified Government shall submit the following as part of its Annual Report, pursuant to Paragraph 60(c):

(a) The number of miles of unique and repeat gravity sewer pipe inspected by CCTV during the preceding calendar year as separate totals. If the Unified Government has not achieved the required mileage of CCTV during the reporting year, the Annual Report shall identify and discuss the reasons why the mileage requirement was not achieved;

(b) The number of miles of gravity sewer pipe cleaned during the preceding calendar year. If the Unified Government has not achieved the required mileage of cleaning during the reporting year, the Annual Report shall identify and discuss the reasons why the mileage requirement was not met;

(c) The number of manholes, by category, e.g., combined, separate, storm, that were inspected, repaired, rehabilitated and/or replaced during the preceding calendar year. If the Unified Government has not achieved the required number of manholes inspected, repaired, rehabilitated and/or replaced during the reporting year, the Annual Report shall identify and discuss the reasons why the requirement was not met;

(d) The location and lengths of sewer pipe repaired, rehabilitated, and/or replaced during the preceding calendar year;

(e) The number of Pump Stations inspected or otherwise assessed during the preceding calendar year and a brief description of any completed or scheduled repairs; and

(f) The location and lengths of Force Mains assessed during the preceding calendar year, a brief description of the findings of the assessment and any completed or scheduled repairs.

H. Certification of Legal Authority

34. The Unified Government hereby certifies that as to the Sewer System, to the extent allowable by applicable law, it has sufficient legal authority to:

- (a) control I/I from private and public sources;
- (b) require that sewers and connections be properly designed and constructed;
- (c) ensure there is proper installation, testing and inspection of new and rehabilitated sewers;
- (d) implement the general and specific prohibitions of the Pretreatment Program as defined in 40 C.F.R. § 403.5 and to implement its approved Pretreatment Program;
- (e) prohibit Inflow to the SSS and provide mechanisms for requiring its removal as warranted; and
- (f) control the introduction of fats, oil, and grease from commercial institutions and establishments.

35. The legal authority may be in the form of sewer use ordinances, service agreements, contracts or other legally binding mechanisms.

VIII. EVALUATION OF SEWERSHEDS WITHIN THE UNIFIED GOVERNMENT’S SEWER SYSTEM

36. The Unified Government’s Sewer System consists of CSS and SSS as depicted on the map attached hereto as Appendix B. The Unified Government shall implement the requirements of this Section for the Sewer System in accordance with any deadlines set forth below and in Section IX.

A. Sewer System Evaluation Work Plan

37. By no later than March 15, 2013, the Unified Government shall submit for review and approval by EPA in accordance with Section XII, with a copy to the State, a Sewer System Evaluation Work Plan (“SSE Work Plan”) for completing the evaluations, analysis, modeling, alternatives development, and public participation as identified in Subsections B through F, below: Subsections B and C address the characterization, evaluation and development of the alternatives for addressing overflows in the SSS; Subsections D and E address the characterization, evaluation and development of alternatives for addressing overflows in the CSS; and Section F addresses public and stakeholder involvement. The SSE Work Plan shall include a detailed description of work to be performed and shall serve as the framework for the development of the IOCP. Upon approval by EPA, the Unified Government shall implement the SSE Work Plan. The Unified Government shall include in each Annual and Semiannual Report, pursuant to Section XII, information regarding implementation of the approved SSE Work Plan.

B. Sanitary Sewer System Characterization

38. The Unified Government shall complete a characterization of its SSS (“SSS Characterization”) in accordance with the requirements of this Subsection and Subsection C, below. The Unified Government shall summarize the actions taken to complete the SSS

Characterization activities in the Annual Report required under Section XII for the twelve-month period in which the requirements were completed. The results of the SSS Characterization shall be reported in the SSS Characterization Report and submitted to EPA for review and comment no later than August 31, 2015, with a copy to the State. If EPA provides comments on the SSS Characterization Report within forty-five (45) days of the Unified Government's submittal, the Unified Government may, within thirty (30) days after receipt of such comments, revise the SSS Characterization Report to address the comments and resubmit it/them to EPA, with a copy to the State. The final SSS Characterization Report shall be submitted with the IOCP.

39. The SSS Characterization shall be used to develop the remedial measures in the IOCP required pursuant to Section IX, and shall be carried out with consideration of the guidance provided in the appropriate sections of the *Handbook: Sewer System Infrastructure Analysis and Rehabilitation*, EPA/625/6-91/030, 1991; *Existing Sewer Evaluation and Rehabilitation*, WEF MOP FD-6, 2009; the National Association of Sewer Service Companies ("NASSCO") "Manual of Practice;" and sound engineering practice. The SSS Characterization shall:

(a) identify Sewersheds with Excessive I/I that may be causing and/or contributing to capacity-related SSOs (including Private Property Backups) and/or Bypasses at the WWTPs;

(b) identify and quantify, through flow monitoring, modeling, or analyses SSOs within each Sewershed and the volumes associated with each SSO;

(c) identify areas subject to chronic capacity-related Private Property Backups;

(d) identify typical sources of I/I within the SSS Sewersheds;

(e) identify the design constraints of Force Mains and Pumping Stations, including failure of individual pumps, lack of redundant pumps, and lack of alternative power sources that contribute to SSOs, including Private Property Backups:

(f) identify and quantify sources of I/I within demonstration areas determined to have Excessive I/I rates;

(g) identify cross connections between the SSS and sources, such as water supply lines or storm sewers, and unauthorized connections to the SSS within demonstration areas where SSES investigations are performed; and

(h) identify physical degradation of the SSS that causes or contributes to SSOs (including Private Property Backups) within demonstration areas where SSES investigations are performed.

40. The SSS Characterization shall include, at a minimum, the following elements:

(a) Review of existing data concerning SSOs, sewage flows, WWTPs and SSS attributes (i.e., pipe diameters, pipe segment lengths, catchment characteristics, invert elevations), and an evaluation of the accuracy, completeness and adequacy of that data for purposes of supporting the characterization of the SSS. The data review will further identify any additional data needed to satisfy the requirements identified in Paragraph 37 and the Unified Government shall obtain the additional data to complete the SSS Characterization.

(b) Acquisition of asset data and preparation of a SSS inventory for those sewers to be included in the hydraulic model of the SSS, as shown in Appendix C, including, at a minimum, all gravity interceptor sewers 15- inches and larger; all other sewers to points

at least 1000 feet upstream of known recurring SSOs; emergency overflows; and, force mains serving major pumping stations (capacity of 1000 gpm minimum or greater) in the SSS. Surveys and field investigations for asset data acquisition shall be performed using GPS or other appropriate technology to obtain missing or incomplete asset data.

(c) Completion of an inventory of existing SSS pumping station data for use in the hydraulic modeling. Data defining the installed pumping units, wet well dimensions, and pump operating control settings shall be obtained. As a minimum, pumping unit data shall include field-developed pumping system head curves for all pump stations having firm capacities of 1000 gpm or greater.

(d) Determination of WWTP hydraulic capacities of the major process units in the treatment train performed by in-plant stress-testing, by calculation, review of historical performance records, or by hydraulic modeling.

(e) Dry and wet weather flow monitoring with concurrent rainfall monitoring beginning no later than March 1, 2013, as needed to reasonably characterize flows in the system and provide adequate data for development of computer models. Dry weather monitoring shall be carried out so as to allow the characterization of sanitary wastewater flow rates, baseline groundwater infiltration rates, and diurnal flow patterns. Wet-weather monitoring shall be carried out so as to allow the characterization of rainfall-induced infiltration and stormwater inflow rates. Monitoring site selection, equipment selection, equipment installation, calibration, maintenance, and data quality assurance checks shall generally conform to the recommendations presented in the *Code Of Practice For The Hydraulic Modeling Of Sewer Systems Version 3.001*,

December 2002 by The Chartered Institution of Water and Environmental Management (CIWEM, formerly WaPUG).

(f) Analyses of flow monitoring data to estimate I/I that enters the collection system.

(g) Identification of high priority Sewersheds. High priority Sewersheds will be those with constructed SSOs, capacity restrictions, recurring wet-weather SSOs, and/or high I/I rates.

(h) Based on the analysis of the flow monitoring conducted in (e) of this Paragraph, the Unified Government shall select a minimum of three demonstration areas located in high priority Sewersheds. Demonstration areas shall be subject to field investigation for the purpose of identifying and quantifying sources of I/I and establishing rehabilitative procedures for reduction of I/I. Detailed field investigation may include, but not be limited to:

- (i) Flow monitoring;
- (ii) Manhole Inspections;
- (iii) Smoke Testing;
- (iv) Building Inspections;
- (v) Dye Testing;
- (vi) CCTV Inspections; and
- (vii) Data processing and analysis of inspection data to identify and

categorize system defects and I/I sources.

(i) I/I reduction demonstration projects within high priority Sewersheds shall be performed to gather information specific to the Unified Government's SSS and to the

application of various rehabilitation techniques for guidance of future, system-wide I/I reduction. Temporary flow monitoring shall be performed downstream from the I/I reduction demonstration projects prior to commencing rehabilitation projects (pre-construction flow monitoring) and following completion of rehabilitation (post-construction monitoring). Assessment of the flow data from those monitors will include comparing the system's rainfall response to the data collected during the original flow monitoring performed under (e) in this Paragraph, and determining the effectiveness of the demonstration project to reduce I/I and SSOs. The Unified Government will utilize data developed in the I/I reduction demonstration projects along with performance data demonstrated by other communities and other published literature to forecast planning level probable rates of I/I reduction to be utilized in the development of the IOCP. Additional detailed SSE work may be required during the detailed design phase of remedial projects when implementing the IOCP.

(j) Development of a dynamic computerized SSS Hydraulic Model for the assessment of the hydraulic capacity of the SSS, as identified in Appendix C. Identification of the causes of capacity-related SSOs, and the identification of appropriate remedial measures to address capacity limitations identified for a level of service range to be defined in the SSE Work Plan submitted under Paragraph 37 above. The SSS Hydraulic Model shall be capable of providing an understanding of the response of the SSS to wet weather events and an evaluation of the impacts of proposed remedial measures and reduction of I/I flows. The model shall include, at a minimum, all gravity interceptor sewers 15- inches and larger; all other sewers to points at least 1000 feet upstream of known recurring SSOs; and force mains serving major pumping stations (capacity of 1000 gpm minimum) in the SSS. The model shall be developed

and calibrated in accordance with the recommendations presented in the *Code Of Practice For The Hydraulic Modeling Of Sewer Systems Version 3.001*, December 2002 by The Chartered Institution of Water and Environmental Management (CIWEM, formerly WaPUG).

(k) The SSS Hydraulic Model, as depicted in Appendix C, shall be applied for performance of a capacity assessment of the SSS to allow a technically sound evaluation of the causes of capacity-related SSOs and overloading or bypasses at the WWTPs for the defined level of service range. In Sewersheds that are not depicted in Appendix C, desk-top capacity analyses (without modeling) of gravity lines, pumping stations, and force mains for existing and future conditions shall be performed.

C. SSO Control Alternatives Development and Evaluation

41. The Unified Government shall develop and evaluate alternatives that include specific measures that, if implemented, will result in Adequate Capacity in the SSS and/or at the WWTPs, as identified in the approved IOCP, with the goal of eliminating capacity-related SSOs, Unpermitted Bypasses, and wet weather related NPDES permit noncompliance. Alternatives development and evaluation shall include:

(a) Identification of WWTP upgrades and repair measures necessary to achieve WWTP compliance with NPDES permit limitations and requirements to eliminate Bypasses, except as may be specifically authorized pursuant to 40 C.F.R. § 122.41(m).

(b) Assessment of potential SSO reduction technologies appropriate for each Sewershed considering unique Sewershed-specific features. Specific technologies to address capacity limitations may include, but are not limited to, I/I reduction or removal, increases in

pumping station and sewer capacity in the SSS, construction of storage or equalization basin facilities, or increases in wastewater treatment capacity.

(c) Evaluation of I/I removal and reduction to determine the appropriate I/I removal level versus providing additional transport and/or treatment capacity in each Sewershed. Anticipated I/I removal rates shall reflect current industry practice, local experience, and if available, the results obtained from I/I reduction demonstration projects.

(d) Development of recommended SSO control alternatives in each Sewershed that provide Adequate Capacity in the SSS based upon a range of service levels considering the technologies that were screened in (b) above. The following tasks shall be conducted to develop recommended SSO control alternatives:

(i) Evaluation of the expected performance of the specific technology, or combination of technologies to address capacity limitations;

(ii) Application of the SSS Hydraulic Model for each alternative under evaluation. The SSS Hydraulic Model shall be utilized to estimate the sizes of the improvement alternatives;

(iii) Cost evaluations will be performed to help guide selection of alternatives. The Unified Government will consider implementation costs versus the performance for each control alternative;

(iv) Evaluation of the location of control facilities by considering factors such as the availability of sufficient space for the proposed facility as well as environmental, political, or institutional issues; and

(v) Consideration of Green Infrastructure alternatives, as described in Section X.

D. CSS Characterization

42. The Unified Government shall conduct a characterization of the CSS (“CSS Characterization”) in accordance with the requirements of this Subsection and Subsection E, below. The Unified Government shall summarize the actions taken to complete the CSS Characterization activities in the Annual Report required under Section XII for the twelve-month period in which the requirements were completed. The results of the CSS Characterization shall be reported in the CSS Characterization Report and submitted to EPA for review and comment no later than May 31, 2015, with a copy to the State. If EPA provides comments on the CSS Characterization Report within forty-five (45) days of the Unified Government’s submittal, the Unified Government may, within thirty (30) days after receipt of such comments, revise the CSS Characterization Report to address the comments and resubmit it/them to EPA, with a copy to the State. The final CSS Characterization Report shall be submitted with the IOCP.

43. The CSS Characterization shall be carried out in accordance with the federal Combined Sewer Overflow Control Policy, 59 Fed. Reg. 18688 (April 19, 1994) (CSO Policy), and shall include:

(a) A review of existing data concerning CSOs, sewage flows, WWTPs and CSS attributes (i.e., diversion structures, outfalls, pipe diameters, pipe segment lengths, drainage areas, catchment characteristics, invert elevations), and an evaluation of the accuracy, completeness and adequacy of that data for purposes of supporting the characterization of the CSS.

(b) Acquisition of asset data and preparation of a CSS inventory for sewers to be included in the hydraulic model of the CSS, as shown in Appendix C, including, at a minimum, all gravity interceptor sewers 15- inches and larger; all other sewers to points at least 1000 feet upstream of all diversion structures; all dry weather outlet sewers from diversion structures to the receiving WWTP; and all wet weather overflow lines from diversion structures to outfalls and force mains serving major pumping stations (capacity of 1000 gpm minimum) in the CSS. Surveys and field investigations shall be performed using GPS or other appropriate technology to obtain missing or incomplete asset data.

(c) Completion of an inventory of existing CSS pumping station data for use in hydraulic modeling. Data defining the installed pumping units, wet well dimensions, and pump operating control settings shall be obtained. As a minimum, pumping unit data shall include field-developed pumping system head curves for all pump stations having firm capacities of 1000 gpm or larger.

(d) Determination of the Kaw Point WWTP hydraulic capacity of the major process units in the treatment train through the performance of one or more of the following, as appropriate: in-plant stress-testing, calculation, review of historical operating data, and/or hydraulic modeling.

(e) Evaluation of precipitation data to define typical rainfall distribution patterns and recurrence intervals. Project and historical data will be used to develop design events and a Design Year that will be applied when modeling existing conditions and alternative control scenarios.

(f) Dry and wet weather flow monitoring with concurrent rainfall monitoring beginning no later than March 1, 2013, to reasonably characterize flows in the system and provide adequate data for the calibration and verification of models that simulate the frequency, magnitude, and duration of CSOs. Dry weather monitoring shall be carried out so as to allow the characterization of sanitary wastewater flows, baseline groundwater infiltration rates and diurnal flow patterns. Wet weather monitoring shall be carried out so as to allow the characterization of the hydraulic response of the CSS to rainfall events. Monitoring site selection, equipment selection and installation, calibration, maintenance, and data quality assurance checks shall generally conform to the recommendations presented in the *Code Of Practice For The Hydraulic Modeling Of Sewer Systems Version 3.001*, December 2002 by The Chartered Institution of Water and Environmental Management (CIWEM, formerly WaPUG).

(g) Development of a dynamic computerized CSS Hydraulic Model for understanding of system hydraulic response to rain events, identification of the causes of Unauthorized CSOs, and for the identification of appropriate remedial measures to address capacity limitations during design events and the Design Year. The model shall include those CSS elements identified in Appendix C including, sewers 15- inches and larger; all other sewers to points at least 1000 feet upstream of all diversion structures; all dry weather outlet sewers from diversion structures to the receiving WWTP; all wet weather overflow lines from diversion structures to outfalls; flow contributions from SSS connections; and force mains serving major pumping stations (capacity greater than 1000 gpm) in the CSS. The CSS Hydraulic Model shall be developed and calibrated in accordance with the recommendations presented in the *Code Of Practice For The Hydraulic Modeling Of Sewer Systems Version 3.001*,

December 2002 by The Chartered Institution of Water and Environmental Management (CIWEM, formerly WaPUG).

(h) The CSS Hydraulic Model will then be applied to evaluate alternative control scenarios and will be used to:

(i) Simulate CSO occurrence, duration, and volume for rain events other than those that occurred during the flow monitoring period;

(ii) Simulate the hydraulic response of portions of the CSS that have not been monitored;

(iii) Simulate the effect of sanitary sewer system connections to the combined sewer system; and

(iv) Develop CSO statistics such as the number of CSO activations and percent of combined sewage captured and treated in a Design Year.

(i) Water Quality Characterization. The objective of the water quality characterization is to assess the impacts of CSO and non-CSO sources on receiving streams.

Work to be performed shall include:

(i) Compilation and analysis of existing water quality and receiving stream data: This task will include compiling and assessing relevant information and data to meet the following objectives:

(A) Identify receiving streams and applicable water quality standards; 303(d) impairments and TMDLs for receiving streams; and available water quality data for CSO discharges and receiving streams;

(B) Identify water quality parameters of concern;

(C) Identify sensitive areas; and

(D) Identify data gaps.

(ii) Water quality monitoring: This task will include designing and implementing a water quality monitoring program to address data gaps related to water quality characterization of CSO and non-CSO sources and receiving streams and support the development and calibration of receiving stream models.

(iii) Receiving stream modeling: This task will include selection, development, calibration, validation, and application of water quality models to characterize the existing impact of CSO and non-CSO sources on receiving streams, assess water quality benefits under various control scenarios, and assess attainment with water quality standards.

E. CSO Control Alternatives Development and Evaluation

44. The Unified Government shall consider the range of alternatives specified in the CSO Policy and associated Long Term Control Plan Guidance, including Green Infrastructure storm water infrastructure or BMPs, and varying levels of control within those alternatives, using expected benefits and cost-effectiveness to help guide the evaluation of controls. A series of tasks shall be performed to screen options and determine the most likely approaches for CSO reduction in CSS Sewersheds. Alternatives development and evaluation shall include:

(a) Maximization of Treatment at the Kaw Point WWTP. Proper evaluation of “convey and treat” or “store and treat” alternatives shall require evaluating the capacity of the Kaw Point WWTP to receive and treat wet weather flows. Plant analysis shall include review of methods to maximize treatment during wet weather. Evaluations will assess treatment efficiency impacts due to increased hydraulic loading, rate of increase in loading, and first flush loading.

(b) Performance of a preliminary CSO technology applicability assessment for each CSS Sewershed considering unique Sewershed-specific features such as diversion structures/outfalls, receiving waters, land uses, and public input. Technologies that shall be considered are generally grouped as described in the EPA document entitled “Combined Sewer Overflows - Guidance for Long-Term Control Plan.” Consideration shall also be given to Green Infrastructure alternatives.

(c) Development of recommended CSO control alternatives considering the technologies that were screened in (b) above. The following tasks shall be conducted to develop recommended control alternatives:

(i) Assurance that control alternatives are consistent with the regulatory requirements of the Nine Minimum Controls;

(ii) Evaluation of the expected performance of the technology, or combination of technologies, which make up the alternative under consideration. Performance evaluation in each Sewershed will consider eliminating individual overflow locations; relocating (when appropriate and possible) overflow locations; reducing overflow frequency and/or volume; and partial treatment and discharge (when appropriate). Elimination and reduction evaluations will include sewer separation (partial or total, whichever is appropriate) and combinations of storage and transport for treatment alternatives. Relocation evaluations will include diversion structure and outfall consolidation (where appropriate) and relocation of outfalls to locations where impacts will not be as significant on receiving waters. Green Infrastructure technologies or BMPs will be evaluated for reducing overflow volumes and frequency and replacement of

storage alternatives where determined to be feasible through the assessment performed pursuant to Subparagraph (b) of this Paragraph.

(iii) Application of the CSS Hydraulic Model for each alternative under evaluation. The CSS Hydraulic Model shall be utilized to estimate improvement sizes necessary to achieve ranges of percent wet weather capture as well as an average number of overflow events in the Design Year consistent with the CSO policy. The CSS Hydraulic Model outputs from the most promising alternatives shall also be input to the water quality model to assess resulting receiving waters quality impacts.

(iv) Perform cost evaluations to help guide selection of controls. These evaluations shall consider a range of controls at different costs of implementation. Modeling results, both CSS and water quality, generated during the performance evaluations, shall be utilized when assessing the benefits to be attained by each control alternative. Implementation costs for each control alternative shall be developed and performance versus cost comparisons shall then be made for the range of alternatives considered.

(v) Performance of preliminary siting considerations evaluations considering availability of sufficient space for the proposed facility, distance of the site from CSO diversion structure(s) or outfall(s) that it will control, and environmental, political, or institutional issues related to locating the control facility on the site.

F. Public Participation and Stakeholder Involvement

45. The Unified Government shall identify in the SSE Work Plan a public participation program that will ensure there is adequate public participation during the

development of the Unified Government's IOCP. The public participation program shall include, at a minimum, the following:

(a) The means by which the Unified Government will make information pertaining to the completion of the development of the IOCP available to the public for review. These activities may include website development, neighborhood/project meetings, newsletters, media management, and special events.

(b) The means by which the Unified Government shall solicit comments from the public on the completion of the development of the IOCP. The Unified Government shall make appropriate efforts to reach, at a minimum, homeowners, commercial businesses, industrial businesses, the media, community groups and neighborhood associations, civic organizations and clubs, business and trade associations, schools, service organizations, and related special interest organizations.

(c) Consideration of comments provided by the public as Unified Government completes the development of the IOCP.

IX. INTEGRATED OVERFLOW CONTROL PLAN

46. By no later than September 30, 2016, the Unified Government shall submit to EPA for review and approval in accordance with Section XII, with a copy to the State, an IOCP for the Sewer System developed using the information collected pursuant to Section VIII and reported in the SSS Characterization Report and the CSS Characterization Report. As part of the IOCP, the Unified Government shall complete the development of the LTCP for the CSS and a remedial plan for the SSS. The IOCP shall include specific measures and schedules that, when implemented, will ensure the Unified Government shall achieve and maintain compliance with

the requirements of its WWTP permits, the CWA and regulations promulgated thereunder, and EPA's CSO Policy.

47. The IOCP shall include an evaluation of the range of alternatives, developed for each Sewershed under Part IX, for efficacy in reducing or treating CSOs for the Design Year for providing Adequate Capacity in the SSS, based upon the range of control levels evaluated in the SSE Work Plan, for eliminating Bypasses (except as authorized under 40 C.F.R. § 122.41(m)) at the WWTPs, and for implementing Green Infrastructure technologies or BMPs, where feasible and appropriate. This evaluation shall consider the costs, effectiveness (e.g., for the CSS area, in terms of overflow volume reduction, pollutant of concern loading reductions, and frequency of activation reductions, etc.), and water quality benefits of the selected alternatives. The alternatives evaluated for the CSS as part of the IOCP shall be consistent with those identified in the CSO Policy.

48. In identifying, assessing and prioritizing alternatives for its IOCP, the Unified Government shall include an analysis of the following factors:

- (a) impact on areas with low-income and minority communities, including the schedule for implementation, in consideration of EPA's Plan EJ 2014 (<http://www.epa.gov/environmentaljustice/plan-ej/index.html>) and Presidential Executive Order 12898;
- (b) human health and environmental impact risks;
- (c) frequency and volume of SSOs, CSOs, Unauthorized CSOs and Bypasses;
- (d) integration of SSO remedial measures with LTCP projects; and

(e) effect of any changed (increased or decreased) SSS flows to the CSS and WWTPs.

49. In identifying, assessing and prioritizing alternatives for the CSS area in its IOCP, the Unified Government shall give the highest priority to controlling overflows to sensitive areas in accordance with the CSO Policy.

50. For each alternative or combination of alternatives evaluated as part of the IOCP applicable to the CSS area, including maximizing flow to the WWTP, the Unified Government's assessment shall include, at a minimum:

(a) the reduction in the average number of untreated CSOs for the Design Year;

(b) the percent wet weather capture achieved for the Design Year;

(c) a determination, expressed in present value, consistent, year-specific dollars, of the "project costs," as that term is described in Section 3.4.1 of EPA's August 1995 *Guidance for Long Term Control Plans*, for each alternative or combination of alternatives;

(d) an evaluation of the expected water quality improvements for every pollutant of concern in the receiving waters for the Design Year;

(e) an analysis of the estimated peak hourly and sustained flows to the Kaw Point WWTP for a variety of storm events of varying durations and return frequencies, and their effects on maximizing flows to the WWPT and treating such flows; and

(f) a "knee of the curve" cost-performance analysis for each selected alternative or combination of alternatives that will allow for the comparison of the costs to:

(i) the associated expected water quality improvements;

- (ii) the reduction in volume of the CSOs;
- (iii) the reduction in CSO events; and
- (iv) the reduction in pollutant of concern loading from CSOs.

51. The LTCP shall utilize the methodology outlined in EPA's February 1997 *Combined Sewer Overflows: Guidance for Financial Capability Assessment and Schedule Development* ("EPA FCA"). As indicated in the EPA FCA, the Unified Government may also submit any additional documentation that would create a more accurate and complete picture of its financial capability.

52. For each alternative or combination of alternatives evaluated as part of the IOCP applicable to the SSS area, the Unified Government's assessment shall include, at a minimum:

- (a) SSO reduction performance for the level of service range to be identified in the SSE Work Plan submitted under Paragraph 37 above;
- (b) the integration on the range of alternatives considered for the CSS for areas of the SSS tributary to the CSS; and
- (c) the estimated capital, annual operation and maintenance, and life-cycle costs expressed in present value, consistent, year-specific dollars.

53. The IOCP shall include:

- (a) the selection of CSO control and treatment measures, including the construction of all Sewer System and WWTP improvements, necessary to ensure compliance with the technology-based and water-quality based requirements of the CWA, State law and regulation, and the Unified Government's Kaw Point Permit for the Design Year; and

(b) the selection of SSS control and construction projects, including the construction of all Sewer System and WWTP improvements, necessary to ensure compliance with the technology-based and water-quality based requirements of the CWA, with the goal of eliminating SSOs and Bypasses, other than Bypasses specifically authorized pursuant to 40 C.F.R. § 122.41(m), State law and regulation, and the Unified Government's applicable WWTP Permits.

54. The IOCP evaluation of alternatives for the CSS and SSS shall include an evaluation of the Unified Government's financial capability to fund the selected alternative or combination of alternatives. The Unified Government may present additional information to support the financial capacity analysis.

55. The IOCP shall include a proposed schedule for the design, construction, and implementation of all measures for the SSS and CSS areas. The schedule shall include a deadline for the completion of all construction and full implementation of all measures under the IOCP, which will be established by the Final Consent Decree. The schedule shall also specify the critical construction milestones for each measure, including, at a minimum, dates for:

- (a) completion of design;
- (b) commencement of construction; and
- (c) achievement of full operation.

56. The IOCP shall include a Post-Construction Monitoring Program which shall be used to assess the effectiveness of the selected and completed control measures. The post-construction monitoring program shall be adequate to:

- (a) measure compliance with water quality standards and protection of designated uses;
- (b) assess and document the environmental benefits attributable to CSO control measures and SSS mitigation actions;
- (c) update and enhance the collection system computer models; and
- (d) provide public education and information on the need for implementation of the CSO control measures and SSS mitigation actions, any water quality improvements, and the progress made in achieving the performance criteria.

X. GREEN INFRASTRUCTURE

57. The Unified Government shall consider Green Infrastructure (“GI”) alternatives as part of the SSS and CSS control alternatives under the IOCP. The IOCP shall contain the following minimum considerations for proposing a Green Infrastructure alternative to traditional gray controls:

- (a) Identification of potential locations for GI: The Unified Government shall identify potential areas within the SSS and/or the CSS that would be suitable for development of a GI control measure. Each potential area shall be prioritized using considerations such as the ability to develop effective GI control measures, availability of land and benefits to minority and low income neighborhoods.
- (b) Pilot Projects: The Unified Government shall, at its discretion, select pilot project(s) to develop demonstration GI control measures. The purpose of the pilot project(s) shall be to evaluate the effectiveness of the GI measure to reduce overflow volumes and frequency so that the Unified Government may choose to implement more extensive GI

projects. The selection of pilot project(s) shall include details regarding the design, construction, operation, post-construction monitoring and evaluation of the effectiveness of the pilot project.

(i) Design criteria: The Unified Government shall establish design criteria for each pilot project so as to maximize the benefit of the GI control measure.

Considerations may include the type of control measure (storage, infiltration, evapotranspiration, etc.), long term maintenance requirements, the ability of the Unified Government to properly operate and maintain the control measure and functionality of the control measure.

(ii) Post-construction monitoring: The Unified Government shall establish and implement a post-construction monitoring plan to evaluate the performance and effectiveness of the GI control measure pilot projects. Monitoring shall include at a minimum, rainfall and flow monitoring to gauge storage and/or infiltration performance.

(c) GI control measures proposal: Based on the performance of the pilot project(s), the Unified Government may propose, with EPA approval, to replace or supplement gray controls with GI controls during IOCP implementation.

58. The IOCP shall contain a schedule for the development of any GI pilot project(s) including specific milestones for the following activities:

- (a) Project identification;
- (b) Design;
- (c) Construction;
- (d) Performance monitoring/evaluation; and
- (e) Final report with recommendations.

XI. IMPLEMENTATION OF THE INTEGRATED OVERFLOW CONTROL PLAN

59. After approval of the IOCP, and associated schedules, by EPA pursuant to the provisions of Section XII (Reporting, Certification and Approval of Submittals), the Unified Government agrees without anything further to modify this Consent Decree to incorporate the approved IOCP as an enforceable part of this Consent Decree.

XII. REPORTING, CERTIFICATION AND APPROVAL OF SUBMITTALS

60. Reports. The Unified Government shall submit the following notices and reports:

(a) Periodic Reports. After the Effective Date of this Consent Decree and until termination of this Decree pursuant to Section XXIII (Termination), the Unified Government shall submit to EPA Annual and Semiannual Reports, as identified in Subparagraphs (b) and (c), below, by email and by either U.S. Mail or an overnight delivery service determined appropriate in accordance with Section XIX (Notices). A copy of each Annual and Semiannual Report shall be provided to the State. The first Annual Report shall include information for the period of time beginning after the Effective Date of this Consent Decree to December 31, 2013, and shall be submitted no later than February 15, 2014. Succeeding Annual Reports shall be submitted no later than February 15 each year until termination of this Consent Decree. Semiannual Reports shall be submitted no later than August 15 each year until termination of this Consent Decree.

(b) Each Annual and Semiannual Report shall cover the activities completed in the immediately preceding reporting period, i.e., January 1 through June 30 activities are reportable in the Semiannual Report and July 1 through December 31 activities are reportable in the Annual Report. Each such Report shall include, at a minimum:

(i) a description of major projects and activities conducted during the most recently completed six-month period to comply with the requirements of this Consent Decree;

(ii) a summary of SSOs, Unauthorized CSOs and Bypasses during the six month period, including the date, locations and associated WWTP collection system, estimated volume, rainfall event as measured by the nearest gauge, and cause (if known) of all Sewer System Overflows for the most recently completed six month period;

(iii) the anticipated major projects and activities that will be performed in the next six month period to comply with the requirements of this Consent Decree;

(iv) if the Unified Government violates any requirement of this Consent Decree or has reason to believe that it is likely to violate any requirement of this Consent Decree in the future, the Unified Government shall notify the United States of such violation and its likely duration, with an explanation of the violation's likely cause and of the remedial steps taken, and/or to be taken, to prevent or minimize such violation. If the cause of a violation cannot be fully explained at the time the report is due, the Unified Government shall include a statement to that effect in the report. The Unified Government shall investigate to determine the cause of the violation and then shall submit an amendment to the report, including a full explanation of the cause of the violation, within thirty (30) days after the date of submittal of the semiannual report;

(v) any additional information that demonstrates that the Unified Government is implementing the remedial measures required in this Consent Decree; and

(vi) any report or other information required by this Consent Decree to be submitted or included in an Annual or Semiannual Report due on a specific date.

(c) Annual Reports. Each Annual Report shall, in addition to the information identified in Subparagraph (b), above, also include the following information:

(i) a report on performance measures under the CMOM Program, including:

(A) the number of miles and locations of sewer pipes that were cleaned during the preceding calendar year pursuant to Paragraph 33(b), and if the Unified Government has not achieved the required mileage of sewer pipe cleaning, identify and discuss the reasons why the mileage requirement was not achieved;

(B) the number of manhole inspections, the number of manhole frame adjustments, and the number of manholes that were permanently repaired/rehabilitated/replaced during the preceding calendar year pursuant to Paragraph 33(c), and if the Unified Government has not achieved the required number of manholes inspected and/or repaired, rehabilitated, and replaced, identify and discuss the reasons why these requirements were not achieved;

(C) the locations and number of miles of sewer pipes that were temporarily and/or permanently repaired, rehabilitated or replaced, and a summary of all acute defects repaired during the preceding calendar year pursuant to Paragraph 33(d), and if the Unified Government has not achieved the required mileage of sewer pipe repair, replacement or rehabilitation, identify and discuss the reasons why the mileage requirement was not achieved;

(D) the number of Pump Stations that were inspected, as well as the location and capacity of those Pump Stations inspected during the preceding calendar year pursuant to Paragraph 33(e);

(E) the locations and number of miles of Force Mains that were inspected and/or repaired during the preceding calendar year pursuant to Paragraph 33(f), and if the required number of miles of Force Mains that were inspected and/or repaired has not been achieved, identify and discuss the reasons why the mileage requirement was not achieved; and

(F) if the Unified Government does not meet its service levels as set forth in its CMOM Program Plan pursuant to Paragraph 29, submit for EPA's approval proposed revisions to its CMOM Program Plan that are necessary to achieve the service levels;

(ii) a summary of each remedial measure and capital project implemented during the preceding Calendar Year pursuant to this Consent Decree, including a description of the Unified Government's compliance with the requirements of Sections V through X of this Consent Decree;

(iii) updated information for the preceding year of all known SSOs, Unauthorized CSOs, and Bypasses, providing:

(A) updated map(s) of the Sewer System that identify the locations of the known SSOs, Unauthorized CSOs, Bypasses, Sewersheds, WWTPs, Pumping Stations, Force Mains, wastewater storage facilities, intra- or inter-Sewershed flow control structures, outfalls, and Private Property Backups, that occurred during the preceding year, with a coding system identifying the cause(s) of the Sewer System Overflows;

(B) updated listings of SSOs, Unauthorized CSOs and Bypasses with sufficient information to demonstrate the Unified Government is tracking location, estimated volumes and causes, if known, of such events;

(C) comparison of the number of SSOs, Unauthorized CSOs and Bypasses for the past three years along with corresponding rainfall data measured at the nearest available gauge; and

(D) based in NMC Program implementation, a report on the estimated frequency, volume, if known, and CSO Outfall number(s) for CSO activations.

(d) MS4 Annual Report. The Unified Government shall send to KDHE, with a copy to EPA, its MS4 Annual Report on the date specified in the effective MS4 Permit.

61. All notices and reports required to be submitted pursuant to this Consent Decree shall be submitted to the recipients specified in accordance with Section XIX of this Consent Decree (Notices).

62. Certification Statement. Each written notice, document or report submitted by the Unified Government to the United States under this Consent Decree shall be signed by a responsible party of the Unified Government, as defined by 40 C.F.R. § 122.22, and include the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

This certification requirement does not apply to emergency or similar notifications where compliance would be impractical.

63. Nothing in this Section relieves the Unified Government of the obligation to provide the requisite notice for purposes of Section XIV (Force Majeure) of this Consent Decree.

64. The reporting requirements of this Consent Decree do not relieve the Unified Government of any reporting obligations required by the Clean Water Act or its implementing regulations or by any other federal, state, or local law, regulation, permit, or other requirement.

65. Review and Comment by the State. The State may, within thirty (30) days of receipt of a copy of any Deliverable submitted by the Unified Government to the State pursuant to this Consent Decree, provide to EPA written comments or recommendations. If a time constraint imposed by this Consent Decree does not allow thirty (30) days for the State to provide comments to EPA, EPA shall notify the State of the reasonable time period in which it may provide written comments to EPA, and the State shall provide any written comments within that time period. EPA agrees to consider any written comments by the State that are received by EPA within the time periods described in this Paragraph, but EPA may, at its sole unreviewable discretion, adopt or not adopt comments submitted by the State.

66. Approval of Deliverables. After review of any modification of a plan, work plan, statement of work, report, or other item that is required to be submitted pursuant to this Consent Decree for EPA approval, EPA may, in writing: (a) approve the submission; (b) approve the submission upon specified conditions; (c) approve part of the submission and disapprove the remainder; or (d) disapprove the submission. EPA shall make good faith efforts to review and approve, approve with modifications, or disapprove all submittals required by the Consent

Decree within ninety (90) days of EPA's receipt of same. In the event that EPA's review of any submittal exceeds ninety (90) days, then the Unified Government may provide written notice to EPA of all actions under this Consent Decree that will be delayed or otherwise affected by EPA's extended review. Upon providing such notice, the due date for all affected actions will be extended by the number of days beyond ninety (90) that EPA requires to provide its approval, modification and approval, or disapproval to the Unified Government, unless within the 90 day period EPA provides notice, along with a written explanation, to the Unified Government that an extension of a due date is not warranted. If EPA denies the extension of a due date, the Unified Government may initiate dispute resolution pursuant to Section XV of this Consent Decree (Dispute Resolution).

67. If the submission is approved pursuant to Subparagraph 66(a), the Unified Government shall take all actions required by the plan, report, or other document, in accordance with the schedules and requirements of the plan, report, or other document, as approved. If the submission is conditionally approved or approved only in part, pursuant to Paragraph 66, Subparagraphs (b) or (c), the Unified Government shall, upon written direction of EPA take all actions required by the approved plan, report, or other item that EPA determines are technically severable from any disapproved portions, subject to the Unified Government's right to dispute under Section XV of this Decree (Dispute Resolution), the specified conditions and/or determination of severability.

68. If the submission is disapproved in whole or in part pursuant to Paragraph 66, Subparagraphs (c) or (d), then, subject to the Unified Government's right to dispute the disapproval under Section XV of this Consent Decree (Dispute Resolution), the Unified

Government shall correct all deficiencies and resubmit the plan, report, or other item, or disapproved portion thereof, for approval, in accordance with the preceding Paragraphs within ninety (90) days for plans and sixty (60) days for reports or other items, or such longer time as specified by EPA in such notice or agreed to by EPA in writing.

69. Any Stipulated Penalties applicable pursuant to Section XIII, below, to the original submission, as provided in this Section XII of this Decree, shall accrue during the time period specified in Paragraph 68 above, but shall not be payable unless the resubmission is untimely or is disapproved for material deficiencies; provided that, if the original submission was so deficient as to constitute a material breach of the Unified Government's obligations under this Decree, the Stipulated Penalties applicable to the original submission shall be due and payable notwithstanding any subsequent resubmission.

70. If a resubmitted plan, report, or other item, or portion thereof, is disapproved in whole or in part, EPA may again require the Unified Government to correct any deficiencies, in accordance with the preceding Paragraphs subject only to the Unified Government's right to invoke Dispute Resolution. EPA may also deem the Unified Government to be out of compliance with this Consent Decree for failure to timely submit the submittal in compliance with the requirements of this Consent Decree, and may assess stipulated penalties pursuant to this Consent Decree, subject only to the rights of the Unified Government under the Dispute Resolution provisions of this Consent Decree.

71. Obligation to Implement. In the event that EPA approves or approves upon conditions any submittal pursuant to this Section, the Unified Government shall proceed to take

any action required to implement the submittal as approved by EPA, subject only to the rights of the Unified Government under the dispute resolution provisions of this Consent Decree.

72. Submittals are Enforceable. All submittals required to be approved, including all schedules set forth therein, shall be enforceable under this Consent Decree as if they were set forth herein upon approval or approval upon conditions (after conclusion of any Dispute Resolution period). Any portion of a submittal that is not specifically disputed by the Unified Government shall be enforceable during any Dispute Resolution period, provided that implementation of the non-disputed portions of the submittal is not dependent upon implementation of the disputed portion.

73. Revisions to Submittals. The United States and the Unified Government recognize that the Unified Government may need or want to revise certain submittals during the term of this Consent Decree. Such revisions shall not be considered modifications to the Consent Decree for purposes of Section XXII of this Consent Decree (Modification). The Unified Government must obtain EPA's prior written approval of any revision to the substance of any submittal initially required to be approved.

XIII. STIPULATED PENALTIES

74. The Unified Government shall be liable for Stipulated Penalties to the United States for violations of obligations of this Consent Decree unless excused under Section XIV (Force Majeure). A violation includes failing to perform any obligation required by the terms of this Decree, including any statement of work or schedule approved under this Decree, according to all applicable requirements of this Decree and within the specified time schedules established by or approved under this Decree.

75. Compliance Measures Related to Storm Sewer System: The following Stipulated Penalties shall accrue for each violation by the Unified Government of Section VI of this Decree, as follows:

(a) Failure to timely submit each SOP pursuant to Paragraph 12 of this Consent Decree. “Timely submit” shall mean the report or submittal is made by the date specified in this Consent Decree.:

<u>Period Beyond Submittal Date</u>	<u>Penalty Per Violation Per 30-Day Period</u>
1-30 days	\$5,000 per 30-day period
more than 30 days	\$7,500 per 30-day period

(b) Failure to demonstrate through documentation and/or explanation in its Annual MS4 Report, submitted pursuant to Paragraph 60(d) of this Consent Decree, timely implementation or completion, as applicable, of each Best Management Practice (“BMP”) by the annual completion date specified in the Compliance Schedule for each BMP identified in the SWMP, attached as Appendix E:

<u>Period of Noncompliance</u>	<u>Penalty Per BMP Violation Per 30-Day Period</u>
1st through 90th day	\$4,000 per 30-day period
91st day through 120th day	\$7,500 per 30-day period
121st day and beyond	\$10,000 per 30-day period

(c) Failure to timely adopt or maintain an ordinance as required by Paragraph 14 of this Decree.

<u>Period of Noncompliance</u>	<u>Penalty Per Violation Per 30-Day Period</u>
1st through 90th day	\$4,000 per 30-day period
91st day through 120th day	\$7,500 per 30-day period

<u>Period Beyond Completion Date</u>	<u>Penalty Per Violation Per Day</u>
1 - 30 days	\$1,000 per day
31 - 60 days	\$2,000 per day
61 days and beyond	\$4,000 per day

(c) Sewer System Overflows.

(i) Dry Weather CSOs from CSO Outfalls: For each CSO that occurs after the Date of Lodging of the Partial Consent Decree from a permitted CSO Outfall during a dry weather period, the Unified Government shall pay a stipulated penalty of \$2,500 per day during which the CSO occurs.

(ii) Capacity-Related SSOs and Unauthorized CSOs: For each Capacity-Related SSO or Unauthorized CSO that occurs after the Unified Government has completed the remedial measures for that Sewershed pursuant to Section VII of the Consent Decree or Section IX of the Consent Decree, as implemented pursuant to Section XI (Implementation of the IOCP) that reaches waters of the United States, the Unified Government shall pay a stipulated penalty in the following amounts:

\$1,000 for any discharge of 1,000 gallons or less:

\$2,500 for any discharge more than 1,000 gallons but less than 10,000; and

\$5,000 for any discharge of 10,000 gallons or more.

(iii) O&M-Related SSOs and Unauthorized CSOs: For each non-capacity related SSO or Unauthorized CSO, other than a Private Property Backup, that occurs due to the Unified Government's failure to properly implement the requirements of subsection VII.F. or VII.G. of this Decree (Nine Minimum Controls Plan or CMOM Program Plan), as

applicable, the Unified Government shall pay a stipulated penalty of \$2,500 per day of occurrence. The Unified Government bears the burden of demonstrating that any such non-capacity related SSO or Unauthorized CSO occurred despite the Unified Government's best efforts to implement the Nine Minimum Control Plan or CMOM Program Plan, as applicable.

(iv) Unpermitted Bypasses:

(A) For each Unpermitted Bypass at the Kaw Point WWTP that occurs before the deadline established for eliminating such bypasses pursuant to the terms of the approved IOCP, as implemented pursuant to Section XI (Implementation of the IOCP) of this Consent Decree, the Unified Government shall pay a stipulated penalty of \$1,000 per day during which an Unpermitted Bypass occurs;

(B) For each Unpermitted Bypass at the Kaw Point WWTP that occurs after the deadline established for eliminating such bypasses to an agreed level of service, pursuant to the terms of the approved IOCP, as implemented pursuant to Section XI (Implementation of the IOCP) of this consent Decree, the Unified Government shall pay a stipulated penalty of \$5,000 per day during which an Unpermitted Bypass occurs; and

(C) For each Unpermitted Bypass at any WWTP other than the Kaw Point WWTP, the Unified Government shall pay a stipulated penalty of \$5,000 each day during which an Unpermitted Bypass occurs.

77. Stipulated Penalties under this Section shall begin to accrue on the day after performance is due or on the day a violation occurs, whichever is applicable, and shall continue to accrue until performance is satisfactorily completed or until the violation ceases. Stipulated Penalties shall accrue simultaneously for separate violations of this Consent Decree. The

Unified Government shall pay any Stipulated Penalty within thirty (30) days of receiving a written demand by the United States, unless the United States and the Unified Government enter into Dispute Resolution, in which case the provisions of Paragraph 79 apply.

78. The United States may, in the unreviewable exercise of its discretion, reduce or waive any Stipulated Penalties otherwise due the United States under this Consent Decree.

79. Stipulated Penalties shall continue to accrue as provided in Paragraph 77, above, during any Dispute Resolution, but need not be paid until the following:

(a) If the dispute is resolved by agreement or by a decision of the United States that is not appealed to the Court, the Unified Government shall pay accrued penalties agreed or determined to be owing to the United States within thirty (30) days of the effective date of the agreement or the receipt of the United States' decision or order;

(b) If the dispute is appealed to the Court, the Unified Government shall pay all accrued penalties determined by the Court to be owing within sixty (60) days of receiving the Court's decision or order, except as provided in Subparagraph (c), below;

(c) If there is an appeal of the District Court's decision, the Unified Government shall pay all accrued penalties determined to be owed within fifteen (15) days of receiving the final appellate court decision.

80. The Unified Government shall make payment of Stipulated Penalties owing to the United States in accordance with instructions provided to the Unified Government by the Financial Litigation Unit ("FLU") of the United States Attorney's Office for the District of Kansas. The FLU shall provide the payment instructions to:

Lew Levin, Chief Financial Officer
Unified Government of Wyandotte County/Kansas City, Kansas
701 North 7th Street, Suite 330

Phone: 913-573-5270
Fax: 913-573-2890
E-mail: llevin@wycokck.org

Jody Boeding, Chief Counsel
Unified Government of Wyandotte County/Kansas City, Kansas
701 N. 7th Street
Suite 961
Phone: 913-573-5060
Fax: 913-573-5243
E-mail: jboeding@wycokck.org

81. At the time of payments of stipulated penalties required by this Section, the Unified Government shall simultaneously send written notice of payment and a copy of any transmittal documentation to the United States in accordance with Section XIX of this Decree (Notices). The notices shall reference the Civil Action Number and DOJ Number 90-5-1-1-09463. The notice shall state that the payment is for Stipulated Penalties and shall state for which violation(s) the penalties are being paid.

82. If the Unified Government fails to pay Stipulated Penalties according to the terms of this Consent Decree, the Unified Government shall be liable for interest on such penalties, as provided for in 28 U.S.C. §1961, accruing as of the date payment became due.

83. Payment of stipulated penalties as set forth above shall be in addition to any other rights or remedies which may be available to the United States by reason of the Unified Government's failure to comply with requirements of this Consent Decree, and any applicable federal, State or local laws, regulations, NPDES Permits, and all other applicable permits.

XIV. FORCE MAJEURE

84. A "force majeure event" is any event arising from causes beyond the control of the Unified Government, its contractors, or any entity controlled by the Unified Government,

that delays or prevents the performance of any obligation under this Consent Decree despite the Unified Government's best efforts to fulfill the obligation. The requirement that the Unified Government exercise best efforts to fulfill the obligations includes using best efforts to anticipate any potential force majeure event and best efforts to address the effects of any such event (a) as it is occurring and (b) after it has occurred to prevent or minimize any resulting delay to the greatest extent possible. "Force Majeure" does not include the Unified Government's financial inability to perform any obligation under this Consent Decree.

85. If any event occurs or has occurred that may delay the performance of any obligation under this Consent Decree, whether or not caused by a force majeure event, the Unified Government shall provide written notice to EPA by electronic or other means (in accordance with Section XIX) within 15 days after the time the Unified Government first knew of, or by the exercise of due diligence, should have known of, a claimed force majeure event. The notice shall state the anticipated duration of any delay, its cause(s), the Unified Government's past and proposed actions to prevent or minimize any delay, a schedule for carrying out those actions, the Unified Government's rationale for attributing any delay to a force majeure event, and a statement as to whether, in the opinion of the Unified Government, such event may cause or contribute to an endangerment to public health, welfare or the environment. The Unified Government shall include with any notice all available documentation supporting the claim that the delay was attributable to a force majeure. Failure to comply with the above requirements shall preclude the Unified Government from asserting any claim of force majeure for that event for the period of time of such failure to comply, and for any additional delay caused by such failure. The Unified Government shall be deemed to know of any

circumstance of which the Unified Government, any entity controlled by the Unified Government, or the Unified Government's contractors knew or should have known.

86. If the United States agrees that a force majeure event has occurred, the United States will agree to extend the time for the Unified Government to perform the affected requirements for the time necessary to complete those obligations. An extension of time to perform the obligations affected by a force majeure event shall not, by itself, extend the time to perform any other obligation. The United States will notify the Unified Government in writing of the length of the extension, if any, for performance of the obligations affected by the force majeure event. When the United States agrees to a material extension of time, the appropriate modification shall be made pursuant to Section XXII of this Consent Decree (Modification).

87. If the United States does not agree that the delay or anticipated delay has been or will be caused by a force majeure event, the United States will notify the Unified Government in writing of their decision. The United States' position shall be binding, unless the Unified Government invokes Dispute Resolution under Section XV of this Consent Decree. In any such dispute, the Unified Government bears the burden of proving, by a preponderance of the evidence, that each claimed force majeure event is a force majeure event, that the Unified Government gave the notice required by Paragraph 85, that the force majeure event caused any delay that the Unified Government claims was attributable to that event, that the duration of the extension sought will be warranted under the circumstances, and that the Unified Government exercised best efforts to prevent or minimize any delay of the performance of any obligation under this Consent Decree caused by the event.

XV. DISPUTE RESOLUTION

88. Unless otherwise expressly provided for in this Consent Decree, the dispute resolution procedures of this Section shall be the exclusive mechanism to resolve disputes arising under or with respect to this Consent Decree.

89. Informal Dispute Resolution. Any dispute subject to dispute resolution under this Consent Decree shall first be the subject of informal negotiations. The dispute shall be considered to have arisen when the Unified Government sends the United States a written Notice of Dispute. Such Notice of Dispute shall state clearly the matter in dispute. The period of informal negotiations shall not exceed thirty (30) days from the date the dispute arises, unless that period is modified by written agreement of the United States and the Unified Government. If the United States and the Unified Government cannot resolve a dispute by informal negotiations, then the position advanced by the United States shall be considered binding unless, within thirty (30) days after the conclusion of the informal negotiation period, the Unified Government invokes formal dispute resolution procedures as set forth below.

90. Formal Dispute Resolution. The Unified Government shall invoke formal dispute resolution procedures, within the time period provided in the preceding Paragraph, by serving on the United States a written Statement of Position regarding the matter in dispute. The Statement of Position shall include, but may not necessarily be limited to, any factual data, analysis, or opinion supporting the Unified Government's position and any supporting documentation relied upon by the Unified Government.

91. The United States shall serve its Statement of Position within forty-five (45) days of receipt of the Unified Government's Statement of Position. The United States' Statement of

Position shall include, but may not necessarily be limited to, any factual data, analysis, or opinion supporting that position and any supporting documentation relied upon by the United States. If within ten (10) days of receiving the United States' Statement of Position, the Unified Government requests to confer with the United States about the Statement of Position, the United States will confer (in person and/or by telephone) with the Unified Government, but such a conference shall be concluded no later than twenty-one (21) days after the issuance of the United States' Statement of Position. The United States will reaffirm or amend their Statement of Position within fourteen (14) days after the conclusion of the conference. The United States' Statement of Position shall be binding on the Unified Government unless the Unified Government files a motion for judicial review of the dispute in accordance with the following Paragraph.

92. The Unified Government may seek judicial review of the dispute by filing with the Court and serving on the United States in accordance with Section XIX of this Consent Decree (Notices) a motion requesting judicial resolution of the dispute. If no conference was requested pursuant to Paragraph 91, the Unified Government's motion must be filed within thirty (30) days of receipt of the United States' Statement of Position pursuant to Paragraph 91. If a conference was requested pursuant to the previous Paragraph, the Unified Government's motion must be filed within thirty (30) days of receipt of the United States' reaffirmation of its original Statement of Position or issuance of an amended Statement of Position. The motion shall contain a written statement of the Unified Government's position on the matter in dispute, including any supporting factual data, analysis, opinion, or documentation, and shall set forth the

relief requested and any proposed schedule within which the dispute must be resolved for orderly implementation of the Consent Decree.

93. The United States shall respond to the Unified Government's motion within the time period allowed by Local Rule 6.1(d) of this Court. The Unified Government may file a reply memorandum, within the time period allowed by Local Rule 6.1(d).

94. Standard of Review:

(a) Disputes Concerning Matters Accorded Record Review. Except as otherwise provided in this Consent Decree, in any dispute brought under Paragraph 90 pertaining to the adequacy or appropriateness of plans, procedures to implement plans, schedules or any other items requiring approval by EPA under this Consent Decree; the adequacy of the performance of work undertaken pursuant to this Consent Decree; and all other disputes that are accorded review on the administrative record under applicable principles of administrative law, the Unified Government shall have the burden of demonstrating, based on the administrative record, that the position of the United States is arbitrary and capricious or otherwise not in accordance with law.

(b) Other Disputes. Except as otherwise provided in this Consent Decree, in any other dispute brought under Paragraph 90, the Unified Government shall bear the burden of demonstrating that its position complies with the requirements of this Consent Decree and fulfills the Objectives specified in Section III.

95. The invocation of dispute resolution procedures under this Section shall not, by itself, extend, postpone, or affect in any way any obligation of the Unified Government under

this Consent Decree, unless and until final resolution of the dispute so provides. Stipulated Penalties shall be assessed and paid as provided in Section XIII (Stipulated Penalties).

XVI. INFORMATION COLLECTION AND RETENTION

96. The United States and its representatives, including attorneys, contractors, and consultants, shall have the right to enter the Unified Government facilities at all reasonable times, upon presentation of credentials, to:

- (a) monitor the progress of activities required under this Consent Decree;
- (b) verify any data or information submitted to the United States in accordance with the terms of this Consent Decree;
- (c) obtain samples;
- (d) obtain documentary evidence, including photographs and similar data; and
- (e) assess the Unified Government's compliance with this Consent Decree.

97. The Unified Government shall maintain copies of any reports, plans, permits, and documents submitted to EPA pursuant to this Consent Decree, including any underlying research and data supporting such submittals, for a period of five (5) years from the date of submission. Where a contractor fails to retain such documents, and the Unified Government can demonstrate that the contractor's missing or destroyed documents contained the same information as documents in the possession of the Unified Government, the Unified Government shall not be liable for the contractor's failure to retain such documents. Drafts of final documents or plans, and non-substantive correspondence and emails do not need to be retained. This record retention requirement shall apply regardless of any corporate or institutional document retention policy to

the contrary. At any time during this record-retention period, the United States may request copies of any documents or records required to be maintained under this Paragraph.

98. Before destroying any documents or records subject to the requirements of the preceding Paragraph, the Unified Government shall notify the United States at least ninety (90) days prior to the destruction of any such records or documents, and, upon request by the United States, the Unified Government shall deliver any such records or documents to EPA. The Unified Government may assert that certain documents, records, or other information are privileged under the attorney-client privilege or any other privilege recognized by federal law. If the Unified Government asserts such a privilege, it shall provide the following: (a) the title of the document, record, or information; (b) the date of the document, record, or information; (c) the name and title of the author of the document, record, or information; (d) the name and title of each addressee and recipient; (e) a description of the subject of the document, record, or information; and (f) the privilege asserted.

99. This Consent Decree in no way limits or affects any right of entry and inspection, or any right to obtain information, held by the United States or the State pursuant to applicable federal or state laws, regulations, or permits, nor does it limit or affect any duty or obligation of the Unified Government to maintain records or information imposed by applicable federal or state laws, regulations, permits, or orders.

XVII. EFFECT OF SETTLEMENT/RESERVATION OF RIGHTS

100. This Consent Decree is a partial remedy for the civil claims of the United States for the violations alleged in the Complaint filed in this action. Therefore, this Consent Decree does not resolve these civil claims and is without prejudice to the United States' right to seek

further relief to address these claims or any future claims, including, but not limited to, further injunctive relief, and civil penalties, and the right of the United States to seek further administrative relief to address these claims. It is the present intention of the Parties to seek to negotiate a modification to this Consent Decree or a subsequent consent decree to fully resolve the civil claims of the United States for the violations alleged in the Complaint. However, the Parties recognize that such negotiations may not result in such a resolution and that the United States reserves the right to take such actions as it deems appropriate and necessary to resolve these claims and any future claims. In this and any subsequent administrative or judicial proceeding initiated by the United States for injunctive relief, civil penalties, or other appropriate relief relating to the Unified Government's compliance with the Clean Water Act, the Unified Government shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppel, issue preclusion, claim preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by the United States in the subsequent proceeding were or should have been brought in the instant case. In this and any subsequent administrative or judicial proceeding initiated by the United States for injunctive relief, civil penalties, or other appropriate relief relating to the Unified Government's compliance with the Clean Water Act, Plaintiff shall not assert, and may not maintain, that the Unified Government is barred or in any way hindered from asserting any defense or claim based upon the principles of waiver, res judicata, collateral estoppel, issue preclusion, claim preclusion, claim-splitting, or other principles based upon any contention that the defense or claim raised by the Unified Government in the subsequent proceeding were or should have been brought in the instant case.

101. The United States reserves all legal and equitable remedies available to enforce the provisions of this Consent Decree, except as expressly stated herein, and the Unified Government reserves all defenses thereto. This Consent Decree shall not be construed to prevent or limit the rights of the United States to obtain penalties or injunctive relief under the Clean Water Act or its implementing regulations, or under other federal or state laws, regulations, or permit conditions. The United States further reserves all legal and equitable remedies to address any imminent and substantial endangerment to the public health or welfare or the environment arising at, or posed by, the Unified Government, whether related to the violations addressed in this Consent Decree or otherwise.

102. This Consent Decree is not a permit, or a modification of any permit, under any federal, state, or local laws or regulations, and the Unified Government's compliance with the Consent Decree shall be no defense to any action commenced by the United States pursuant to any such laws, regulations, or permits. The Unified Government is responsible for achieving and maintaining complete compliance with all applicable federal, state, and local laws, regulations, and permits. The United States does not, by its consent to the entry of this Consent Decree, warrant or aver in any manner that the Unified Government's compliance with any aspect of this Consent Decree will result in compliance with provisions of the Clean Water Act or with any other provisions of federal, state, or local laws, regulations, or permits.

103. This Consent Decree does not limit or affect the rights of the Unified Government or of the United States against any third parties, not party to this Consent Decree. The effect of this Consent Decree on the rights of third parties, not party to this Consent Decree, against the Unified Government shall be as provided by law.

104. Nothing in this Consent Decree limits the rights or defenses available under Section 309(e) of the Clean Water Act, 33 U.S.C. §1319(e), in the event that the laws of the State, as currently or hereafter enacted, may prevent the Unified Government from raising the revenues needed to comply with this Decree.

105. This Consent Decree shall not be construed to create rights in, or grant any cause of action to, any third party not party to this Consent Decree.

XVIII. COSTS

106. The Parties shall bear their own costs of this action, including attorneys fees, except that the United States shall be entitled to collect the costs (including attorneys fees) incurred in any action necessary to enforce this Consent Decree or to collect any portion of the civil penalty or any Stipulated Penalties due but not paid by the Unified Government.

XIX. NOTICES

107. Unless otherwise specified herein, whenever notifications, submissions, or communications are required by this Consent Decree, they shall be made in writing, indicate the title “United States v. Unified Government and the State of Kansas” in the subject matter line of the transmittal’s cover page, and be addressed as follows:

To the United States:

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611
Re: DOJ No. 90-5-1-1-09463

&

Chief, Water Enforcement Branch
Water, Wetlands and Pesticides Division
Environmental Protection Agency, Region 7
11201 Renner Road
Lenexa, Kansas 66219

&

Chief, Water Programs Branch
Office of Regional Counsel
Environmental Protection Agency, Region 7
11201 Renner Road
Lenexa, Kansas 66219

To EPA only, as opposed to the United States:

Chief, Water Enforcement Branch
Water, Wetlands and Pesticides Division
Environmental Protection Agency, Region 7
11201 Renner Road
Lenexa, Kansas 66219

&

Chief, Water Programs Branch
Office of Regional Counsel
Environmental Protection Agency, Region 7
11201 Renner Road
Lenexa, Kansas 66219

For verbal notification:
Chief, Water Enforcement Branch
913/551-7544

To the State of Kansas through KDHE:

Director, Bureau of Water
Kansas Department of Health and Environment
1000 Jackson St. – Suite 420
Topeka, KS 66612-1367

For verbal notification:
Director, Bureau of Water
785/296-5500

To The Unified Government:

Chief Counsel
Department of Legal Services
Unified Gov't of Wyandotte County/KCK
701 N. 7th Street
Suite 961
Kansas City, Kansas 66101

Director of Public Works
Unified Gov't of Wyandotte County/KCK
701 N. 7th Street, 7th Floor
Kansas City, Kansas 66101

108. Where specifically authorized within this Consent Decree, or as agreed by the Parties in writing, submittals may be made via electronic transmittal to the e-mail address for each addressee identified in Paragraph 107, above.

109. Any Party may, by written notice to the other Parties, change its designated notice recipient or notice address.

110. Notices submitted pursuant to this Section shall be deemed submitted upon the date they are postmarked and mailed, provided to a reputable overnight delivery service, or where appropriate, sent via electronic mail, provided a message of non-deliverability is not received, unless otherwise provided in this Consent Decree or by mutual agreement of the Parties in writing.

XX. EFFECTIVE DATE

111. The Effective Date of this Consent Decree shall be the date upon which this Consent Decree is entered by the Court; provided however, that the Unified Government agrees that it shall be bound to perform duties scheduled to occur prior to the Effective Date. In the event the United States withdraws or withholds consent to this Decree before entry, or the Court declines to enter the Decree, then the preceding requirement to perform duties scheduled to occur prior to the Effective Date shall be null and void.

XXI. RETENTION OF JURISDICTION

112. The Court shall retain jurisdiction over the case until termination of this Consent Decree, for the purpose of resolving disputes arising under this Decree or entering orders modifying this Decree, pursuant to Sections XV (Dispute Resolution) and XXII (Modification), or effectuating or enforcing compliance with the terms of this Decree.

XXII. MODIFICATION

113. The terms of this Consent Decree may be modified only by a subsequent written agreement signed by the United States and the Unified Government or by further order of the Court. Where a modification agreed upon by the United States and the Unified Government constitutes a material change to any term of this Decree, it shall be effective only upon approval by the Court. Non-material changes to this Decree (including Appendices) may be made by written agreement of the United States and the Unified Government without Court approval.

114. Any disputes concerning modification of this Decree shall be resolved pursuant to Section XV of this Decree (Dispute Resolution), provided, however, that, instead of the burden of proof provided by Paragraph 94, the Party seeking the modification bears the burden of demonstrating that it is entitled to the requested modification in accordance with Federal Rule of Civil Procedure 60(b).

XXIII. TERMINATION

115. The Consent Decree is subject to termination only after the Unified Government certifies that it has achieved and maintained compliance with all requirements of this Consent Decree, including, without limitation, (a) payment of all penalties and stipulated penalties due, (b) submission of all Deliverables and approval of all plans required in Sections V, VI and VII or in any amendment to this Consent Decree, (c) completion of all Work and implementation of all the requirements in the plans required in Sections V, VI, VII, VIII, IX, X and XI of this Consent Decree or in any modification of this Consent Decree. A determination by EPA that the Consent Decree should be terminated shall be based on a consideration of whether the Unified Government has satisfied all of the requirements listed above.

116. Notwithstanding the above, the following portions of this Consent Decree may be terminated after the Unified Government certifies that it has met all requirements of the respective portions of the Consent Decree and has satisfactorily complied with its required plan or program for a period of five (5) years following the date of approval of the plan or program by EPA: Section V (Information Management System), Section VI (Compliance Measures Relating to Storm Sewer System), Section VII(D) (Collection System Release Response Plan), Section VII(F) (Nine Minimum Controls Plan), and Section VII(G) (Capacity, Management, Operation, and Maintenance). The Fats, Oil and Grease Control Program Plan, pursuant to Section VII(C), may be terminated after the Unified Government certifies that it has met all requirements of that portion of the Consent Decree and has satisfactorily complied with its plan for a period of two (2) years following certification by the Unified Government, pursuant to Paragraph 20, that it is fully implementing the FOG Control Program Plan.

117. The Unified Government may serve upon the United States a request that the United States and the Unified Government jointly determine that this Consent Decree be terminated, in whole or in part. Any such request shall be in writing and shall include a certification that the requirements of this Consent Decree have been met. If the United States agrees that the Unified Government has satisfied the requirements of this Consent Decree, the United States and the Unified Government shall submit for the Court's approval, a joint stipulation terminating the Consent Decree, or appropriate portions thereof. If the United States determines not to seek termination of the Consent Decree in whole or in part because the requirements of this Consent Decree have not been met, it shall so notify the Unified Government in writing. The notice shall summarize the basis for its decision and describe the

actions necessary to achieve compliance. If the Unified Government disagrees with any such determination, it shall invoke the dispute resolution procedures of this Consent Decree before filing any motion with the Court regarding the disagreement. However, the Unified Government shall not seek dispute resolution of any dispute regarding termination until ninety (90) days after service of its request for Termination.

XXIV. PUBLIC PARTICIPATION

118. This Consent Decree shall be lodged with the Court for a period of not less than thirty (30) days for public notice and comment in accordance with 28 C.F.R. § 50.7. The United States reserves the right to withdraw or withhold its consent if the comments regarding the Consent Decree disclose facts or considerations indicating that the Consent Decree is inappropriate, improper, or inadequate. The Unified Government hereby consents to entry of this Consent Decree without further notice.

XXV. SIGNATORIES/SERVICE

119. Each undersigned representative of the Unified Government and State and the Assistant Attorney General for the Environment and Natural Resources Division of the United States Department of Justice, certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Decree and to execute and legally bind the Party he or she represents to this document.

120. This Consent Decree may be signed in counterparts, and its validity shall not be challenged on that basis.

121. The Unified Government agrees not to oppose entry of this Consent Decree by the Court or to challenge any provision of the Decree, unless the United States has notified the Unified Government in writing that it no longer supports entry of the Decree.

122. The Unified Government agrees to accept service of process by mail with respect to all matters arising under or relating to this Consent Decree and to waive the formal service requirements set forth in Rules 4 and 5 of the Federal Rules of Civil Procedure and any applicable Local Rules of this Court including, but not limited to, service of a summons.

XXVI. INTEGRATION

123. This Consent Decree and its Appendices constitute the final, complete, and exclusive agreement and understanding among the Parties with respect to the settlement embodied in the Decree and supersede all prior agreements and understandings, whether oral or written, concerning the settlement embodied herein. Other than the Appendices, which are attached to and incorporated in this Decree, and Deliverables that are subsequently submitted and approved pursuant to this Decree, no other document, nor any representation, inducement, agreement, understanding, or promise, constitutes any part of this Decree or the settlement it represents, nor shall it be used in construing the terms of this Decree.

XXVII. PARTIAL JUDGMENT

124. Upon approval and entry of this Consent Decree by the Court, this Consent Decree shall constitute a partial judgment of the Court as to the Parties. The Parties recognize that final resolution of the claims set forth in the Complaint will require further remedial action, and this Consent Decree is without prejudice to the Parties' positions as to the merits of any such further relief.

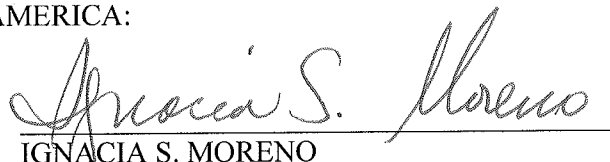
Dated and entered this ____ day of _____, 2013.

UNITED STATES DISTRICT JUDGE
District of Kansas

WE HEREBY CONSENT to the entry of this Consent Decree in the matter of U.S. v. Unified Government of Wyandotte Co. and Kansas City, Kansas and the State of Kansas, subject to the public notice and comment provisions of 28 C.F.R. § 50.7:

FOR THE UNITED STATES OF AMERICA:

Dated: 3/19/13



IGNACIA S. MORENO
Assistant Attorney General
U.S. Department of Justice
Environment and Natural Resources Division

Dated: 3/20/13




ERIKA M. ZIMMERMAN
Trial Attorney
U.S. Department of Justice
Environment and Natural Resources Division
Environmental Enforcement Section
c/o NOAA, Damage Assessment
7600 Sand Point Way, N.E.
Seattle, Washington 98115
Telephone: (206) 526-6608
Facsimile: (206) 526-6665
erika.zimmerman@usdoj.gov

WE HEREBY CONSENT to the entry of this Consent Decree in the matter of U.S. v. Unified Government of Wyandotte Co. and Kansas City, Kansas and the State of Kansas, subject to the public notice and comment provisions of 28 C.F.R. § 50.7:

FOR THE UNITED STATES OF AMERICA (Continued):

BARRY R. GRISSOM
United States Attorney
District of Kansas


Dated: 3/19/2013




DAVID ZIMMERMAN
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D. Kan. No. 23486

WE HEREBY CONSENT to the entry of this Consent Decree in the matter of U.S. v. Unified Government of Wyandotte Co. and Kansas City, Kansas and the State of Kansas, subject to the public notice and comment provisions of 28 C.F.R. § 50.7:

FOR THE UNITED STATES OF AMERICA (Continued):


Dated: 3/7/13 
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Dated: 3/5/2013 
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WE HEREBY CONSENT to the entry of this Consent Decree in the matter of U.S. v. Unified Government of Wyandotte Co. and Kansas City, Kansas and the State of Kansas, subject to the public notice and comment provisions of 28 C.F.R. § 50.7:

FOR THE UNITED STATES OF AMERICA (Continued):


Dated: March 8, 2013


MARK POLLINS
Division Director
Water Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency

Dated: Feb 28, 2013


LOREN DENTON
Municipal Branch Chief
Water Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency

Dated: February 21, 2013


BENJAMIN BAHK
Staff Attorney
Water Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency

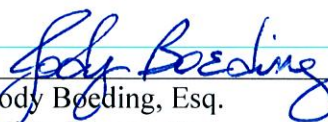
WE HEREBY CONSENT to the entry of this Consent Decree in the matter of U.S. v. Unified Government of Wyandotte Co. and Kansas City, Kansas and the State of Kansas:

FOR DEFENDANT UNIFIED GOVERNMENT OF WYANDOTTE COUNTY AND KANSAS CITY, KANSAS:

Dated: 2-28-2013



Mayor



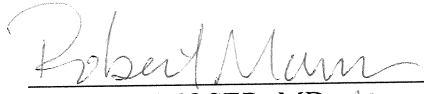
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Attorneys of Record for the Unified Government

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WE HEREBY CONSENT to the entry of this Consent Decree in the matter of U.S. v. Unified Government of Wyandotte Co. and Kansas City, Kansas and the State of Kansas, subject to the public notice and comment provisions of 28 C.F.R. § 50.7:

FOR DEFENDANT THE STATE OF KANSAS:

Dated: March 15, 2013



ROBERT MOSER, MD
Secretary
Kansas Department of Health and Environment

APPENDIX A

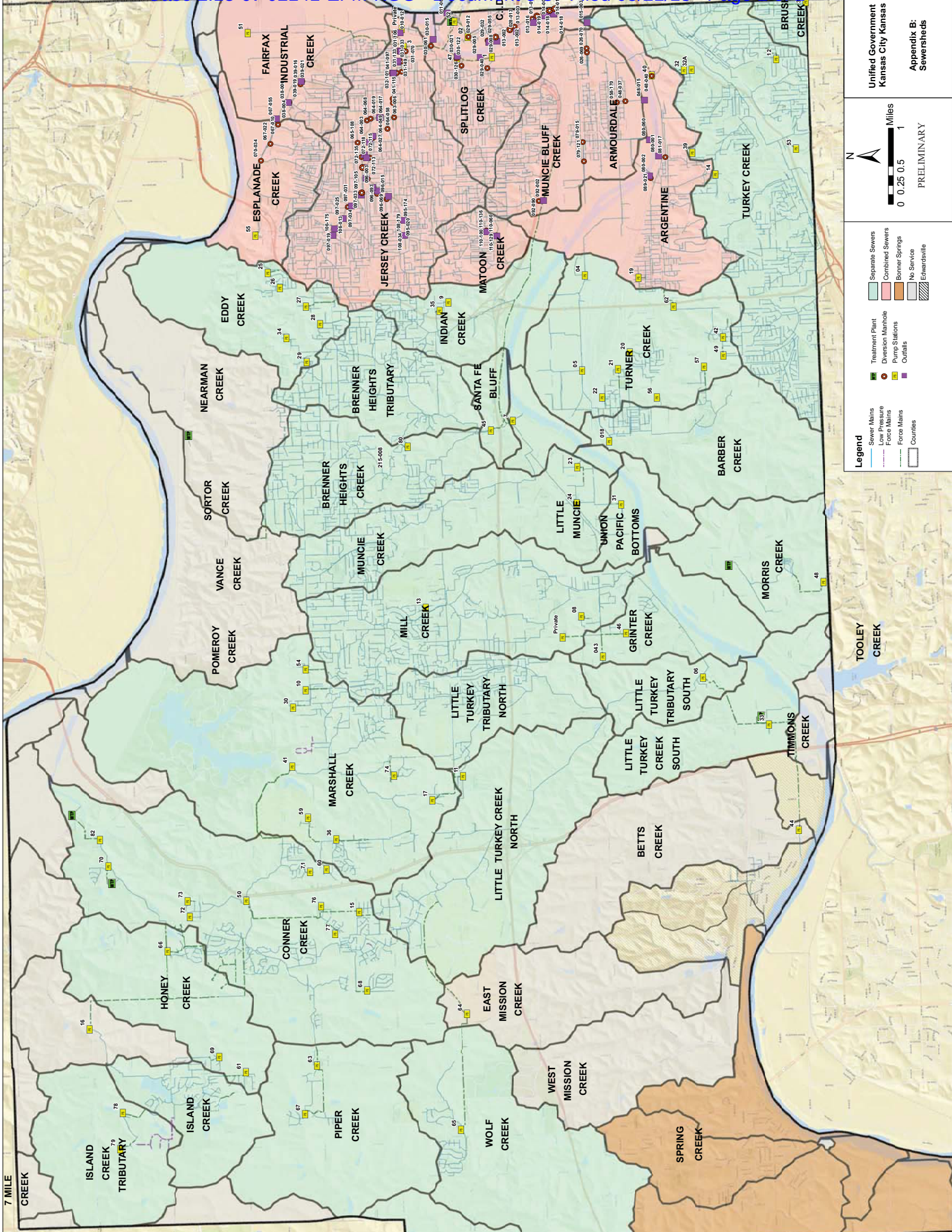
List of NPDES Permits for Unified Government's WWTPs and MS4

**Unified Government of Kansas City, Kansas and Wyandotte County
NPDES Permits**

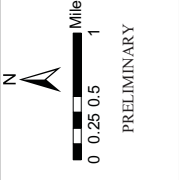
Facility Name, Address & Permit No.	Permit Issuance & Expiration Dates
Wastewater Treatment Plant (WWTP) # 1 a/k/a Kaw Point WWTP 50 Market Street, Kansas City, KS 66118 NPDES No. KS0038563	Issued: 9/19/2001 Effective: 10/01/2001 Expiration: 12/31/2005 (Administratively extended)
WWTP # 3 4130 Brenner Road, Kansas City, KS 66104 NPDES No. KS0085600	Issued: 6/30/2008 Effective: 7/1/2008 Expiration: 6/30/2013
WWTP # 14 73 rd & Holiday Drive, Kansas City, KS 66111 NPDES No. KS0080209	Issued: Effective: 1/1/2011 Expiration: 12/31/2016
WWTP # 20 2443 South. 88 th Street, Kansas City, KS 66111 NPDES No. KS0080195	Issued: Effective: 1/1/2011 Expiration: 12/31/2016
Walcott Bottoms WWTP North 95 th Street & Main Street, Kansas City, KS 66109 NPDES No. KS0099201	Issued: 2/27/2008 Effective: 3/1/2008 Expiration: 2/28/2013
Municipal Separate Storm Sewer System (MS4) 701 North 7 th Street, Kansas City, KS 66101 NPDES No. KS0095656	Issued: 08/28/2007 Effective: 10/01/2007 Expiration: 09/30/2012 (Administratively extended)

APPENDIX B

Sewershed Map



Unified Government
Kansas City Kansas



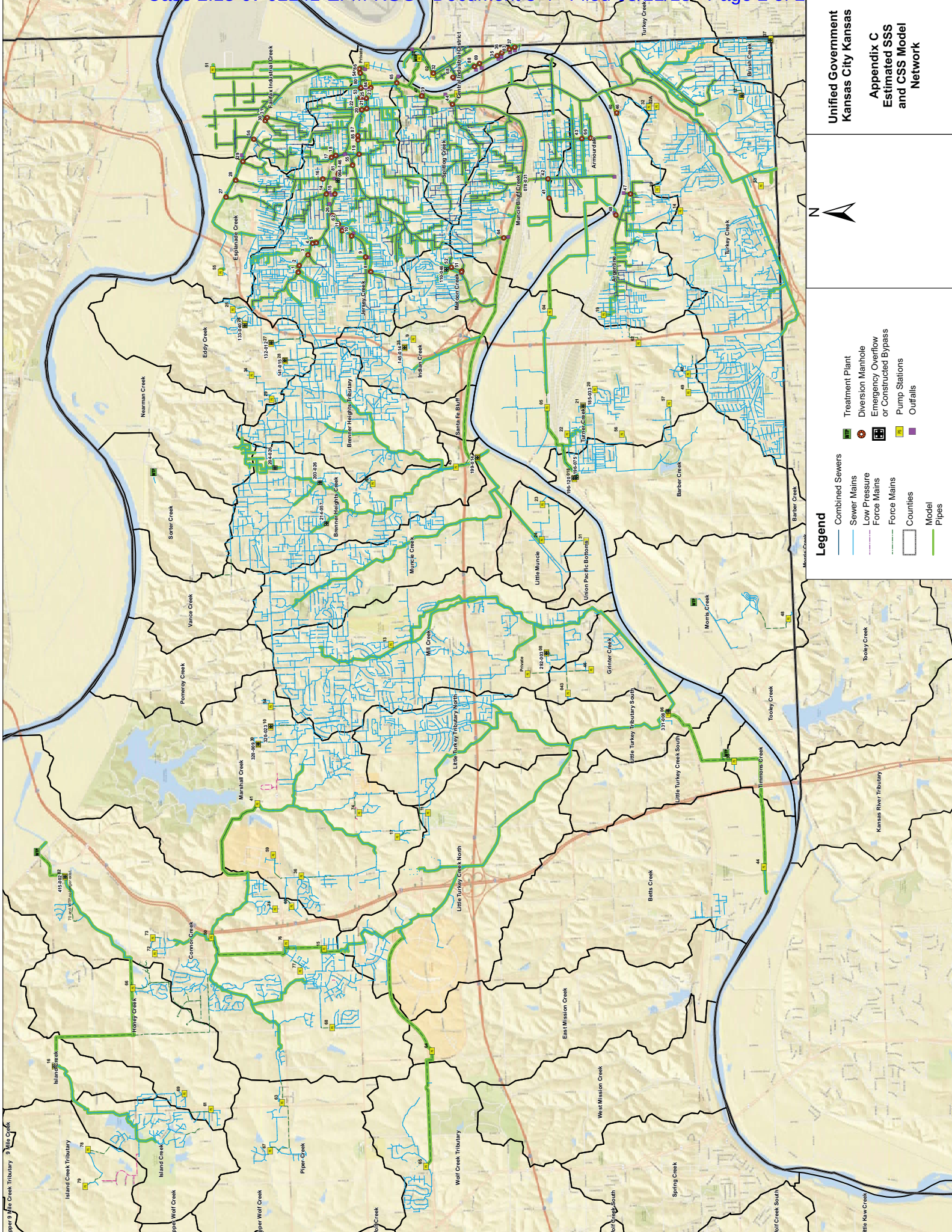
- Legend**
- Sewer Means: Separate Sewers, Combined Sewers, Bonner Springs, No Service
 - Infrastructure: Treatment Plant, Diversion Manhole, Pump Stations, Outfalls
 - Other: Force Mains, Counties

7 MILE
CREEK

Appendix B:
Sewersheds












APPENDIX C

Estimated SSS/CSS Hydraulic Model Network



**Unified Government
Kansas City Kansas**

**Appendix C
Estimated SSS
and CSS Model
Network**

- Legend**
-  Combined Sewers
 -  Sewer Mains
 -  Low Pressure Force Mains
 -  Force Mains
 -  Counties
 -  Model Pipes
 -  Treatment Plant
 -  Diversion Manhole
 -  Emergency Overflow or Constructed Bypass
 -  Pump Stations
 -  Outfalls

Upper 9 Mile Creek Tributary - 9 Mile Creek

Island Creek Tributary

Upper Wolf Creek

Upper Wolf Creek

Wolf Creek

Wolf Creek Tributary

Wolf Creek

Wolf Creek Tributary

Wolf Creek

Wolf Creek South

Spring Creek

Wolf Creek South

Wolf Creek South

Little Kaw Creek

Little Kaw Creek

Little Kaw Creek

Little Kaw Creek

APPENDIX D

Combined Sewer Overflow Outfalls and Diversion Structures

Unified Government of Wyandotte County and Kansas City, Kansas
Combined Sewer Overflow Outfalls and Diversion Structures

CSO Outfall Num.	Old CSO No.	Diversion Manhole Number	Diversion Location - Longitude	Diversion Location - Latitude	Watershed	Location	CSO Outfall Number	Outfall Location - Longitude	Outfall Location - Latitude	Discharge Waterbody
1	1	106-013	-94.660617379	39.135568031	Jersey Creek	28th Street & Georgia Ave	106-175	-94.660616314	39.135612814	Jersey Creek
2	2	097-032	-94.658985989	39.135325044	Jersey Creek	Klamm Park	097-019	-94.659026875	39.135264906	Jersey Creek
3	3	097-034	-94.656464275	39.133589117	Jersey Creek	Klamm Park	097-025	-94.656561007	39.133541004	Jersey Creek
4	4	097-057	-94.653708307	39.132615104	Jersey Creek	2319 North 21st St (in Rear)	097-029	-94.653612424	39.132588325	Jersey Creek
5	5	097-077	-94.653575077	39.131917775	Jersey Creek	2118 Waverly Ave (in Rear)	097-031	-94.653523661	39.131920684	Jersey Creek
6	8	108-034	-94.661132925	39.121761887	Jersey Creek	29th St & Freeman Ave	108-179	-94.661222742	39.122029350	Jersey Creek
7	9	095-020	-94.657487685	39.122668149	Jersey Creek	25th St & New Jersey Ave	095-174	-94.657549968	39.122069474	Jersey Creek
8	10	096-069	-94.652193070	39.125164584	Jersey Creek	1852 Glendale Ave	096-015	-94.651588162	39.124787308	Jersey Creek
9	11	096-042	-94.650806184	39.126929960	Jersey Creek	1932 Glendale Ave	096-093	-94.650379785	39.126812958	Jersey Creek
10	14	072-117	-94.641776035	39.129671878	Jersey Creek	Parallel Pkwy West of 12th Street	072-115	-94.641199417	39.129084823	Jersey Creek
11	15	073-010	-94.641888458	39.128043969	Jersey Creek	N Valley St, south of Jersey Creek	072-118	-94.642007381	39.128695346	Jersey Creek
12	16	065-108	-94.638088204	39.130254582	Jersey Creek	11th St & Lafayette Ave	064-050	-94.638054308	39.127960639	Jersey Creek
13	17	064-003	-94.632885822	39.128453779	Jersey Creek	Across from 2012 Darby Ave	064-019	-94.632396468	39.125857250	Jersey Creek
13	18	064-068	-94.632392908	39.127622062	Jersey Creek	2003 N 9th St (in Driveway)	064-019	-94.632396468	39.125857250	Jersey Creek
14	19	063-006	-94.632337575	39.123173079	Jersey Creek	9th St & Walker Ave	064-017	-94.632287595	39.125764114	Jersey Creek
14	55	064-058	-94.634965063	39.124498466	Jersey Creek	10th St & Walker Ave	064-017	-94.632287595	39.125764114	Jersey Creek
15	20	041-115	-94.621507396	39.122349439	Jersey Creek	5th St N of New Jersey Ave	041-097	-94.621575447	39.122995644	Jersey Creek
16	21	031-013	-94.621298873	39.121390891	Jersey Creek	5th St & Freeman Ave	031-033	-94.618708899	39.121996813	Jersey Creek
16	23	031-011	-94.618759660	39.121402415	Jersey Creek	4th St & Freeman Ave	031-033	-94.618708899	39.121996813	Jersey Creek
17	22	031-001	-94.621382671	39.123340639	Jersey Creek	5th St & Walker Ave	032-101	-94.621341991	39.123026401	Jersey Creek
18	25	031-036	-94.616242151	39.122375454	Jersey Creek	3rd St & New Jersey Ave	031-182	-94.616156155	39.121454527	Jersey Creek
19	26	073-121	-94.647141248	39.128605606	Jersey Creek	NE of 18th St & Troup Ave	072-113	-94.646901234	39.128910870	Jersey Creek
20	27	070-034	-94.641645218	39.148770047	Esplanade	Esplanade St & 12th St	067-055	-94.631600439	39.145478587	Missouri River
20	28	067-022	-94.637619054	39.146798180	Esplanade	Parkwood Blvd & Esplanade St	067-055	-94.631600439	39.145478587	Missouri River
20	29	067-010	-94.633022967	39.145318450	Esplanade	10th St & Esplanade St	067-055	-94.631600439	39.145478587	Missouri River
21	30	039-019	-94.623320082	39.140777033	Esplanade	7th St & Manorcrest Dr (Northwest)	039-104	-94.623246837	39.140856912	Missouri River
22	31	039-021	-94.622562083	39.140387634	Esplanade	North of Viewcrest Dr	039-016	-94.622548707	39.140502160	Missouri River
23	32	029-012	-94.613246638	39.108479435	CID	Ohio Ave & James St	011-064	-94.607205085	39.112336305	Missouri River
24	39	030-122	-94.618637575	39.110838154	Splitlog	Strawberry Hill Pump Station	030-021	-94.618035436	39.110706121	Kansas River
24	40	030-126	-94.620233840	39.109993442	Splitlog	Orville Ave & Thompson St	030-021	-94.618035436	39.110706121	Kansas River
25	41	079-121	-94.644737775	39.087365269	Armourdale	14th St & Kansas Ave	080-060	-94.640126365	39.074823573	Kansas River
25	42	079-015	-94.640033768	39.087432554	Armourdale	12th St & Kansas Ave	080-060	-94.640126365	39.074823573	Kansas River
26	43	058-170	-94.630549462	39.080721278	Armourdale	Mill St & Cheyenne Ave	048-015	-94.630425654	39.075456673	Kansas River
26	66	048-037	-94.630487032	39.079060722	Armourdale	Mill St and Pawnee Ave	048-015	-94.630425654	39.075456673	Kansas River
27	44	029-040	-94.620941175	39.103825584	Splitlog	Northeast of I-70 & Central Ave	029-005	-94.618514020	39.106341941	Kansas River
28	45	052-092	-94.621635027	39.050025309	Turkey Creek	3102 W. 43rd Ave (PS 12)	052-046	-94.621756030	39.050111752	Turkey Creek
29	46	048-040	-94.624589735	39.073908861	Argentine	625 Metropolitan Ave (PS 40)	048-507	-94.624933484	39.074360315	Kansas River
30	47	081-017	-94.644455896	39.071880103	Argentine	So. of 14th St, No. of Ruby Ave.	080-001	-94.644277173	39.073039881	Kansas River
31	48	089-021	-94.649503159	39.074774065	Argentine	Strong Ave Flood Pump Station	080-002	-94.648937160	39.075033982	Kansas River
32	49	026-070	-94.617178874	39.086063896	Armourdale	Shawnee Ave at abandoned 1st St.	015-003	-94.610870390	39.085806663	Kansas River
33	51	110-129	-94.617178874	39.086063896	Matoon Creek	Grandview Blvd & Park Dr	110-060	-94.662255622	39.104548981	Matoon Ck.
34	52	110-100	-94.660771903	39.106405667	Matoon Creek	Grandview Blvd & Riverview Ave	110-136	-94.660916076	39.106372761	Matoon Ck.
35	53	031-035	-94.618641966	39.122513778	Jersey Creek	4th St North of Jersey Creek	031-149	-94.618848665	39.122121657	Jersey Creek
36	54	009-003	-94.611467483	39.122503011	Esplanade/Fairfax	North of Fairfax Drainage District Pump	010-020	-94.611703401	39.121454642	Missouri River
36	86	031-054	-94.612541051	39.122379910	Jersey Creek	1620 Fairfax	010-020	-94.611703401	39.121454642	Missouri River
37	56	038-004	-94.627708767	39.143065683	Esplanade	7th St & Manorcrest Dr (Northwest)	038-006	-94.627784478	39.143184106	Missouri River
38	62	073-002	-94.649140960	39.127607984	Jersey Creek	18th St & Troup Ave	096-003	-94.649131572	39.127737634	Jersey Creek
39	64	092-090	-94.654075752	39.096276686	Muncie Bluff	I-70 at 22nd St	092-002	-94.653977310	39.095379443	Kansas River

CSO Outfall Num.	Old CSO No.	Diversion Manhole Number	Diversion Location - Longitude	Diversion Location - Latitude	Watershed	Location	CSO Outfall Number	Outfall Location - Longitude	Outfall Location - Latitude	Discharge Waterbody
40	65	030-061	-94.615279958	39.115509590	Jersey Creek	2nd St & Minnesota Ave	030-015	-94.613804020	39.115270658	Kansas River
41	68	029-032	-94.607976659	39.044044544	CID	Water Street, North of Lyons Ave	029-581	-94.615241979	39.104451623	Kansas River
42	69	013-003	-94.611307047	39.099628804	CID	North of I-670, East of Kansas River	028-013	-94.612160386	39.099307339	Kansas River
43	80	031-101	-94.616154280	39.122359928	Jersey Creek	3rd St & New Jersey Ave	031-133	-94.616156155	39.121454527	Jersey Creek
44	81	064-027	-94.637035348	39.127296058	Jersey Creek	10th St & Troup Ave	064-049	-94.636693117	39.127352933	Jersey Creek
45	83	014-001			CID	No. of CSO 37, West of Stockyards	014-019			Kansas River
46	84	031-070	-94.616218162	39.120470284	Jersey Creek	3rd St & Oakland Ave	031-106	-94.616262716	39.121375610	Jersey Creek
47	85	041-025	-94.628864968	39.123274670	Jersey Creek	8th St & Walker	041-583	-94.628845254	39.124730528	Jersey Creek
48	87	041-123	-94.627748351	39.123304158	Jersey Creek	7th and Walker	041-551	-94.627486702	39.124479737	Jersey Creek
49	88	013-002			Jersey Creek	West of Fordyce	028-500			Kansas River

APPENDIX E

Stormwater Management Plan Standard Operating Procedures

Appendix E

U.S. v. Unified Government of Wyandotte County and Kansas City, Kansas, et al., Partial Consent Decree



Unified Government of Wyandotte County /
Kansas City, Kansas

Dennis Hays, County Administrator

Date

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- B. Curb Inlet Detail Sheet
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- D. Initial Inventory Lists of UG Owned and Operated Facilities & Buildings
- E. UG adopted Manual of Best Management Practices For Water Quality (August 2009)

INTRODUCTION

The Unified Government of Wyandotte County/Kansas City, Kansas' (UG) municipal separate storm water system (MS4) Stormwater Management Program (SWMP) has been developed in compliance with Kansas Water Pollution Control MS4 Permit and Authorization to Discharge under the National Pollutant Discharge Elimination System (Kansas Permit No. M-MO25-SO01/Federal Permit No. KS0095656).

The SWMP is intended to be detailed with respect to procedures and protocols for implementing the stormwater best management programs to ensure UG personnel in the various departments and divisions have ample guidance and instruction. The SWMP will also allow the UG to allocate financial resources in an efficient and effective manner, consistent with the objectives of the NPDES permit issued October 1, 2007.

The SWMP will be a comprehensive program to manage the quality of stormwater discharged from UG's storm sewer system. The content of the SWMP is based on the requirements of the KDHE permit for the MS4. In addition to addressing the following permit requirements, the SWMP also includes BMPs for Industrial Activity Stormwater Runoff Management:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Construction Site Stormwater Runoff Control
- Post-Construction Stormwater Management Program
- Pollution Prevention/Good Housekeeping
- Industrial Activity Stormwater Runoff Management
- Total Maximum Daily Load (TMDL) and Principal Pollutants of Concern BMPs
- Wet Weather Monitoring Program
- Stormwater Management Program Elements

To implement the SWMP, input will be needed from other UG departments and divisions, the business community, and citizen groups as part of a stakeholder involvement process. For purposes of implementing this updated SWMP, year 1 will begin on January 1, 2013.

To be successful, the SWMP must be easy to understand and implement. Keeping this in mind, it was developed to be clear, simple, and written in such a way that UG staff responsible for stormwater quality can implement program elements. The objective is to ensure that staff understands their responsibilities, and that measurable goals are established to document the effectiveness of the program. As part of the SWMP, several Standard Operating Procedures (SOPs), referenced in the document below, have been or will be developed and will be implemented in a manner that meets the requirements of the Unified Government's MS4 permit. SOPs are internal documents prepared by UG that provide guidance to UG staff as implementation of the permit moves forward. UG will review and update the SOPs as UG updates its programmatic efforts and on an as-needed basis. UG will note any significant updates in the annual reports.

Best management practices (BMPs) have been included in the SWMP to reduce pollutants to the maximum extent practicable. Such BMPs may be modified by the Unified Government where appropriate to achieve program objectives and to accommodate the Government's administration of the storm water management program.

Federal regulations (40 CFR 122.26(b)(8)) define a municipal separate storm sewer system (MS4) as: "a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian Tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States; (ii) Designed or used for collecting or conveying storm water; (iii) Which is not a combined sewer system; and (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2."

EPA and the state are authorized to regulate discharges from the MS4 owned or operated by UG as a point source under the Clean Water Act. Although some programs may be undertaken for the entire area, the SWMP is meant to address the MS4 service area (hereinafter, "service area"). The service area is comprised of those properties that discharge stormwater into the UG stormwater system. It does not include properties that are served by UG's combined sewer system (largely comprised of areas in the eastern part of the UG geographical area, including, the following watersheds: Fairfax Industrial District, Esplanade Creek, Jersey Creek, Splitlog Creek, Central Industrial District, Muncie Bluff Creek, Armourdale, parts of Argentine, parts of Turkey Creek, Brush Creek, and Matoon Creek). It does not include properties that discharge stormwater into stormwater conveyance systems pursuant to separately-issued NPDES permits, properties that discharge stormwater directly into local waterbodies (direct dischargers), or properties located within the City of Bonner Springs, the City of Edwardsville, within in Delaware Township (unincorporated, not within the urbanized area), and the City of Lake Quivira. UG notes that the service area will be further refined with future updates to the existing maps of the MS4. A map of the current MS4 service area is included in the appendices to this SWMP.

MINIMUM CONTROL AND PERFORMANCE MEASURES

1. Public Education and Outreach

As operator of a Phase 1 MS4, the Unified Government (hereinafter "UG") shall identify, schedule, implement, evaluate and modify, as necessary, best management practices that comply with the following overall Public Education and Outreach objectives:

- a. Increase citizen knowledge and awareness of steps that can be taken to reduce stormwater pollution.
- b. Enhance public employees, businesses, and the general public's knowledge of the 1) hazards associated with illegal discharges to local storm sewers which reach area streams, and 2) improper waste disposal implications, and 3) the legal ramifications.
- c. Develop a Public Education and Outreach program which provides a clear and consistent message regarding stormwater issues.
- d. Targeted strategies towards commercial, industrial, institutional entities likely to have significant stormwater impacts.

Best Management Practices (BMPs):

1.A BMP: Gather, prepare and distribute printed educational materials by insertion into BPU water bills and placement at several sites in the service area.

Objective: To educate the general public and new and existing UG employees regarding stormwater quality issues as well as the UG's Stormwater Management Plan through the preparation and distribution of flyers and educational materials.

Measurable Goals:

1.A.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall purchase 5,000 total copies selected from among the following flyers, or their equivalent, from MARC such as: "Build Your Own Rain Barrel", "Keep Sediment Out of Our Water", "Know Your Watershed", "Redirect or Disconnect Your Downspout", "Making and Using Compost", "Oil and Water Don't Mix", "Pick Up After your Pet", "Protect Our Streams", "Storm drain Stewardship", "Use Lawn Chemicals Wisely" and "Wash your Car the Right Way".

1.A.2 Within the first year and after purchasing the flyers listed in Element 1.A.1, the UG shall place the flyers near the elevators on the garage and lobby floor levels of City Hall and in open areas at the Kansas City Kansas Public Library, the Mr. and Mrs. F.L. Schlagle Library, and at nine other public venues which may include the Community Centers, and the Neighborhood Resource Center.

1.A.3 Within the first year after the effective date of the Stormwater Management Plan, the UG shall prepare an envelope insert designed to educate the general public on several of the key elements of the UG's Stormwater Management Plan (hereinafter "SWMP"). The insert shall be bi-lingual (English and Spanish).

1.A.4 Within the first year and after preparing the insert described in Element 1.A.3, the UG shall distribute them in water bills to the approximately 55,500 households in Kansas City, Kansas.

1.A.5 The UG shall provide additional flyers to the locations listed as part of Element 1.A.2 on an as needed basis during the permit term.

Responsible Department(s): Public Works, Public Relations, KCK Public Libraries, Neighborhood Resource Center, Community Centers, Board of Public Utilities (hereinafter "BPU")

Compliance Schedule: Years 1 - 5

Recurrence: One Time (1.A.1, 1.A.2, 1.A.3, 1.A.4), As Needed (1.A.5).

Report(s): Copy of the materials prepared or procured including a list of the distribution sites.

Evaluation Methodology: Review number and type of materials distributed to evaluate utility and effectiveness of the various distribution methods. Review existing public education materials available to target stormwater management, water quality, and stormwater pollution prevention messages to UG's public and private entities. Investigate future development of additional, targeted education materials specific to the UG's program.

1.B BMP: Deliver televised programs/announcements on stormwater management, surface water quality and how to reduce pollutants to the storm sewer system on the UG's cable access channel.

Objective: To reach as broad and diverse an audience as possible, by using the UG's current cable television access channel to enhance the general public's awareness regarding stormwater issues, to convey basic messages on proper household management for stormwater pollution prevention and to inform citizens of their impact on local water quality.

Measurable Goals:

1.B.1 Within the first two years after the effective date of the Stormwater Management Plan, if the UG decides to produce the public service announcement (PSA) referenced in 1.B.2 below in-house, the UG shall contact community partners to assist in preparing the public service announcements to be aired on the UG's cable access channel. These partners may include the local high schools and the Kansas City Kansas Community College. If the UG decides, in its discretion, to obtain the PSA from a third-party, instead of producing it in-house, the UG will, within the first two years after the effective

date of the SWMP, contact the appropriate organization or organizations to discuss licensing options for use of their materials.

1.B.2 Within the first two years after the effective date of the Stormwater Management Plan, the UG will either produce or license, consistent with 1.B.1 above, a PSA for use on the UG's cable access channel. The PSA may discuss any of the following topics: general stormwater concepts, the proper use and disposal of household hazardous waste, lawn care, proper disposal of animal waste, system to report illicit discharges, and the proper maintenance of septic tanks.

1.B.3 Within the third year after the effective date of the Stormwater Management Plan, the UG shall air the public service announcement at least four times a year, with consideration given to the most effective timing for the message (i.e., airing a message on lawn care twice each spring and fall). The subject matter of the announcement may change at UG's discretion.

1.B.4 The public service announcement shall be reviewed after each year it is run and modified as appropriate to present new storm water related educational information for the following year.

Responsible Department(s): Public Works, Public Relations

Compliance Schedule: Year 2 - 5

Recurrence: (1.B.1 and 1.B.2) One Time, (1.B.3) Four Times Annually, (1.B.4) Annually

Report(s): Number of televised programs/announcements run each year.

Evaluation Methodology: Review of viewership numbers for broadcast programming. A survey will be developed via online or mailed questionnaires or surveys to assess the knowledge of local residents on storm water issues and to note any change in residential behavior.

1.C BMP: Enhance the UG's existing website to improve communication and educational materials provided to the public on the SWMP, surface water quality issues and how to reduce pollutants to the storm sewer system.

Objective: To improve communication with and provide information and downloadable documents to the public and to UG employees on stormwater management and pollution prevention.

Measurable Goals:

1.C.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall update their existing "Stormwater Runoff Management" website to include a copy the approved SWMP.

1.C.2 Each year after submitting the UG's Annual Compliance Report to the Kansas Department of Health and Environment (hereinafter "KDHE"), a copy will be made available on the UG's website within 30 days.

1.C.3 Within the first year after preparing the public service announcement for UGTV as described in Element 1.B.2, the PSA will be placed on the "Stormwater Runoff Management" website.

Responsible Department(s): Public Works, Public Relations, Technology

Compliance Schedule: Year 1 - 5

Recurrence: Continuous

Report(s): Describe and identify the number of items that were added and available for download from the website during each permit year.

Evaluation Methodology: Review number of website hits and downloads of materials to evaluate utility of this media for distribution of materials and education of the public.

1.D BMP: Continue to financially contribute to local agencies and organizations within Wyandotte County who promote improvements in stormwater management and provide educational opportunities to county residents.

Objective: To continue the UG's existing policy of making financial contributions to entities who work towards educating the public on the practice of reducing pollutants that will be delivered to the MS4 system.

Measurable Goals:

1.D.1 The UG shall continue to be a major financial contributor to the Wyandotte County Conservation District (WCCD) on an annual basis over the 5-year permit cycle. This organization offers a number of services focused on conservation through financial assistance for conservation projects and education programs to area schools and organizations. The annual contribution will range from \$40,000 to \$50,000, but is contingent upon approval of the UG's annual budget.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: Annual

Report(s): Documentation of annual contributions. List of projects and activities undertaken by the WCCD each permit year.

Evaluation Methodology: Review effectiveness of projects and activities undertaken by the WCCD to reduce the discharge of pollutants to local storm sewers which reach area streams.

1.E BMP: Continue to financially contribute to regional agencies to promote improvements in stormwater management and provide educational opportunities.

Objective: To continue the UG's existing policy of making financial contributions to entities that work locally towards a better environment, subject to approval in UG's annual budget and a determination by UG that suitable candidates exist for this funding.

Measurable Goals:

1.E.1 The UG shall continue to renew its membership annually in the Stormwater Quality Education Committee of the Mid-America Regional Council (MARC), subject to approval of UG's annual budget. Membership dues are based on the UG's annual population. Previous annual contributions have been approximately \$12,000.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: Annual

Report(s): Documentation of annual membership. List of water quality and storm water related projects and activities undertaken by MARC each permit year.

Evaluation Methodology: Review effectiveness of projects and activities undertaken by MARC to reduce the discharge of pollutants to local storm sewers which reach area streams.

1.F BMP: Use of local newsletters for education of stormwater related issues.

Objective: To use UG's existing newsletters and other media outlets to educate the general public about stormwater related issues.

Measurable Goals:

1.F.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall annually submit one article for publication with the Livable Neighborhoods Inc. "Neighborhood" Newsletter. The approximate circulation of this newsletter is 5,000 and includes various neighborhood groups within the community. Articles will contain announcements on community public education and outreach activities, public participation opportunities, and information on best management practices and behavioral changes which can have a positive impact on water quality.

1.F.2 Within the first year after the effective date of the Stormwater Management Plan, the UG shall annually submit at least three articles for publication with the UG's Weekly E-News. The approximate circulation of this newsletter is 3,300 and includes various neighborhood groups within the community. Articles will contain similar announcements and information listed in 1.F.1 above.

Responsible Department(s): Public Relations

Compliance Schedule: Year 1 - 5

Recurrence: Annual

Report(s): The UG shall provide a summary of all articles written, the subject of the each article, and a sampling of the submittals.

Evaluation Methodology: Determine the extent of storm water related knowledge and changes in public behavior via on-line or mailed questionnaires or surveys.

1.G BMP: Annually review the media utilized through public outreach activities.

Objective: To have an annual review of the media through which the public outreach activities take place to identify emerging new media outlets (e.g. Facebook, Twitter, etc.).

Measurable Goals:

1.G.1 The UG shall annually review each of the outlets utilized in public outreach efforts to determine if other outlets or methods should be used.

Responsible Department(s): Public Relations

Compliance Schedule: Year 1 - 5

Recurrence: Annual

Report(s): List of the media outlets used as part of the Public Information program.

Evaluation Methodology: Determine whether materials and media are effective through on-line or mailed questionnaires or surveys.

2. Public Involvement and Participation

As operator of a Phase 1 MS4, the UG shall identify, schedule, implement, evaluate and modify, as necessary, best management practices that comply with the following overall Public Involvement and Participation objectives:

- a. Increase citizen knowledge and awareness of steps that can be taken to reduce pollutants into the storm sewer system.
- b. Participate, through promotion, sponsorship, or other public involvement, in local activities intended to increase public participation to reduce pollutants into the storm sewer system.
- c. To develop a Public Involvement and Participation program which provides for opportunities for the public to become involved in local stormwater issues.

Best Management Practices (BMPs):

2.A BMP: Create a Stormwater Quality Education Grant Program.

Objective: Promote education and public involvement in stormwater quality issues through the development of a stormwater quality education grant program.

Measurable Goals:

2.A.1 Within two years after the effective date of the Stormwater Management Plan, the UG shall prepare a set of criteria for the development of a stormwater quality education grant program with an annual budget of \$30,000 subject to the availability of qualified applicants and contingent upon approval of UG's annual budget. The criteria will include the types of project to be funded, a grant application, selection criteria, a mechanism for delivering the funds, etc.

2.A.2 Within the third year after the effective date of the Stormwater Management Plan, the UG shall annually promote the grant program to local teachers, schools, districts and local non-profits through its website, e-mail newsletter and direct contacts.

2.A.3 A copy of the grant criteria and applications for the selected projects will be provided in the Annual Compliance Report to KDHE. The report will summarize each project's goals, how the projects were selected, whether the goals were achieved, and what impact each project may have had on water quality improvements.

Responsible Department(s): Public Relations, Public Works and Procurement and Contract Compliance.

Compliance Schedule: Year 2 - 5

Recurrence: Annual

Report(s): A copy of the grant process and applications for the selected projects will be provided in the Annual Compliance Report to KDHE.

Evaluation Methodology: Review the number grant applications and the amount of funding which is provided by the UG on an annual basis. Review whether funding for selected projects is providing environment and social benefits to the community and if the funding is well spent.

2.B BMP: Promote and Implement Community Cleanup Programming.

Objective: To promote and assist in the implementation of community cleanup programming on an annual basis.

Measurable Goals:

2.B.1 Beginning in the first year after the effective date of the Stormwater Management Plan, the UG shall partner with Operation Brightside Inc. and potentially other neighborhood and civic organizations to facilitate cleanups on an annual basis. The UG shall assist these neighborhood organizations through the proper disposal of debris and trash.

Responsible Department(s): Public Relations

Compliance Schedule: Year 1 - 5

Recurrence: Annual

Report(s): The UG shall report an estimate of the number groups involved in each cleanup as well as the type and estimated quantity of trash collected during each event.

Evaluation Methodology: Review the number of annual events and the number of groups involved. Review the types and quantities of trash collected.

2.C BMP: Provide assistance and materials to community groups which volunteer to stencil storm drain inlets with “Drains to Stream”.

Objective: Provide civic groups with an opportunity to participate in the marking of storm drainage inlets with “Drains to Stream” and to distribute MARC “Storm Drain Stewardship” brochures.

Measurable Goals:

2.C.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall advertise the availability of a free MARC “Storm Drain Stewardship” brochure through the UG’s website and newsletter.

2.C.2 The UG shall provide the materials to community groups to voluntarily stencil up to 500 stormwater inlets and to distribute 2,000 “Storm Drain Stewardship” brochures on an annual basis. The UG shall work with the community groups to select the area to be canvassed.

2.C.3 The UG will continue its practice of having all new storm drainage inlet castings be manufactured with the phrase “*Exits to River, Do Not Dump Waste*”. A copy of the Curb Inlet Detail Sheet is included in the Appendix.

2.C.4 The UG shall document the number of groups, the name of the group, the approximate number of inlets that were stenciled and the approximate number of brochures that were distributed on an annual basis.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: Annual

Report(s): The UG shall report on the number and name of each group and the approximate number of inlets stenciled and brochures distributed in the Annual Compliance Report to KDHE.

Evaluation Methodology: Review progress towards completing the stenciling of inlets within the service area.

3. Illicit Discharge Detection and Elimination

As operator of a Phase 1 MS4, the UG shall identify, schedule, implement, evaluate and modify, as necessary, best management practices that comply with the following overall Illicit Discharge Detection and Elimination (hereinafter "IDDE") Program objectives:

- a. Develop, implement and enforce a program to detect and require the elimination of illicit discharges.
- b. Effectively prohibit, to the extent allowable through ordinance or other regulatory methods, illicit non-stormwater discharges into the storm sewer system and implement appropriate enforcement measures.
- c. Develop and implement standard procedures to inspect, detect and require the elimination of non-stormwater discharges, including illegal dumping to the storm system.
- d. Enhance and maintain an updated storm sewer system map, showing locations of major outfalls in the service area, and associated surface waters, including the name and locations of water bodies receiving discharges from these outfalls.

Best Management Practices (BMPs):

3.A BMP: Evaluate, and update as necessary, the UG ordinances that pertain to illicit discharges.

Objective: To provide legal authority to conduct inspections and enforcement activities for the reduction of illicit discharges by reviewing and updating the UG's existing ordinances.

Measurable Goals:

3.A.1 The UG is conducting a review of its existing ordinances that apply to illicit discharges. Based upon this review, within the first year after the effective date of the Stormwater Management Plan the UG shall prepare a Memorandum detailing the existing ordinances that apply to illicit discharges, and highlighting any changes that may be needed to establish adequate authority to perform inspections, assess penalties, and issue enforceable orders with regard to illicit discharges into the MS4 system. The UG shall by June 14, 2014 adopt any additional authority necessary to meet the requirements of the SWMP and the UG's National Pollutant Discharge Elimination System (hereinafter "NPDES") permit with regard to illicit discharges.

3.A.2 Certain articles in Chapter 30 of UG's current Municipal Code of Ordinances contain the specific regulations and legal authority to effectively prohibit and require the elimination of illicit discharges into the UG's storm sewer system, in particular Article I, Section 30-11: Unlawful Discharges to Natural Outlets, Article V, Section 30-123: Discharge to Storm Sewers, and Article V, Section 30-124: Prohibited Discharges. A copy of Chapter 30 of the UG's Municipal Code of Ordinances is included in the Appendix.

Responsible Department(s): Legal, Public Works

Compliance Schedule: Year 1

Recurrence: One Time

Report(s): A copy of the memorandum will be provided as well as a summary of any activities to adopt any additional ordinances or legal authority.

Evaluation Methodology: N/A

3.B BMP: Implement and Revise, Where Appropriate, Standard Operating Procedures (hereinafter “SOP”) for illicit discharge detection, sampling, tracking and enforcement requirements.

Objective: To implement a set of SOPs for outfall inspection, water sampling, detection and tracking of illicit discharge eliminations, and for requiring the elimination of illicit discharges and cross-connections and enforcing UG’s illicit discharge ordinances consistent with the terms of this SWMP, which will result in reducing the discharges of pollutants, to the maximum extent practicable.

Measurable Goals:

3.B.1 Beginning on the effective date of the Stormwater Management Plan, the UG shall implement the Applicable Existing SOPs referenced below.

3.B.2 Within the second year after the effective date of the Stormwater Management Plan, the UG shall review and update, if appropriate, the SOPs for outfall inspection, water sampling, detection and tracking of illicit discharge eliminations, and enforcement to incorporate changes to these procedures made as a result of the legal review referenced in BMP 3.A.

3.B.3 A copy of any updated standard procedures referenced below will be included in the Annual Compliance Report submitted to KDHE for the year in which they are updated.

Responsible Department(s): Public Works, Water Pollution Control, Legal

Compliance Schedule: Year 1 and 2

Recurrence: One Time (SOPs), Continuous (Implementation)

Report(s): Copy of SOP.

Applicable Existing SOPs: SWMP-11 (Illicit Discharge Detection and Elimination –Outfall Inspection); SWMP-12 (Illicit Discharge Detection and Elimination – Dry Weather Sampling); SWMP-13 (Illicit Discharge Detection and Elimination – Investigation and Tracking); SWMP-14 (Illicit Discharge Detection and Elimination – Illicit Discharge Enforcement)

Evaluation Methodology: As the program moves forward, annually review and refine, if UG deems it necessary, the procedures and techniques employed in the discovery and elimination of illicit discharges and in the enforcement of UG illicit discharge ordinances.

3.C BMP: Design, implement and maintain suitable and inclusive IDDE-related tracking and reporting system.

Objective: To map, document and report stormwater outfalls, inspections, sampling, tracking and enforcement actions by refining, utilizing and maintaining an appropriate IDDE-related tracking and reporting system which can assist in reducing discharges of pollutants to local storm sewers which reach area streams.

Measurable Goals:

3.C.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall review the quarter-section maps within the service area for outfalls 36-inches in diameter or larger in residential zones and 12-inches in diameter or larger in commercial or industrial zones, excluding cross-road culverts. The UG shall prepare a list of node numbers of major outfalls, meeting those parameters.

3.C.2 During the first two years after the effective date of the Stormwater Management Plan, the UG shall begin tracking stormwater outfall inspections and dry weather sampling based on the Center for Watershed Protection's "Outfall Reconnaissance Inventory Field Sheet" or other published checklists. The system shall be reviewed and adjusted to meet local needs and field conditions.

3.C.3 During the first two years after the effective date of the Stormwater Management Plan, the UG shall begin illicit discharge detection, tracking, and enforcement activities. The system will be reviewed and adjusted to meet local needs and field conditions.

3.C.4 During the first two years after the effective date of the Stormwater Management Plan, the UG shall begin amending the existing stormwater maps to distinguish the outfalls identified as part of BMP 3.C.1 from other nodes and outfalls.

Responsible Department(s): Public Works, Water Pollution Control, Technology

Compliance Schedule: Year 1-5

Recurrence: Continuous (Implementation)

Report(s): Copies of related forms and a summary of the tracking system results.

Evaluation Methodology: Evaluate tracking and reporting system to determine if it captures pertinent and valuable information and provide sufficient reporting results.

3.D BMP: Provide training of illicit discharge detection and elimination program inspection staff.

Objective: Provide training to UG employees whose duties and responsibilities will place them frequently in the field. The training will cover how to recognize an illicit discharge and the correct reporting and follow-up procedures.

Measurable Goals:

3.D.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall hold a training session on how to identify and report suspected illicit discharges in the field for key UG employees with the applicable job responsibilities and classifications. In addition to Erosion & Sediment Control and post-construction BMP inspection staff, these classifications would include Building Inspectors, Street Superintendents, and Sewer Maintenance staff. These training sessions will be conducted every third year and shall be repeated periodically for the benefit of new staff who are placed in these specific positions.

3.D.2 Within the first year after the effective date of the Stormwater Management Plan, the UG shall provide either in-house or arrange commercial training for personnel assigned to conduct the dry weather outfall inspection, sampling and illicit discharge tracking. These training sessions will be conducted annually.

3.D.3 A copy of the training materials and a dated sign-in sheet containing the names of the attendees will be included in the UG's Annual Compliance Report to KDHE for the year in which the training occurs.

Responsible Department(s): Public Works, Water Pollution Control, Building Inspection

Compliance Schedule: Year 1 - 5

Recurrence: (3.D.2 and 3.D.3) Annually, (3.D.1) Every Third Year

Report(s): Copy of training materials and a list of the required and actual attendees per session.

Evaluation Methodology: Analysis of data collected and feedback from field personnel to determine if improvements are necessary in the SOPs and training topics.

3.E BMP: Perform dry weather screening of stormwater outfalls.

Objective: To conduct a system screening program for illicit discharge detection and perform dry weather inspection of stormwater outfalls, as a means to reduce the discharge of pollutants to the maximum extent practicable.

Measurable Goals:

3.E.1 Beginning in the second year after the effective date of the Stormwater Management Plan, of the estimated 2700 outfalls with the UG's jurisdiction, the UG shall conduct at least 250 non-exclusive dry weather inspections per year of stormwater outfall pipes 36-inches in diameter or larger in residential zones and 12-inches in diameter or larger in commercial and industrial zones. The 12-inch and larger storm sewers are currently shown on UG's mapping system. The initial strategy will be to review land use mapping and concentrate on those industrial areas with the greatest potential for illicit discharges. Outfall pipes 36-inches in diameter or larger are typically found in large residential areas and will

allow the UG to investigate potential illicit discharges from these locations. It will also allow the UG to identify the magnitude of illicit discharges in residential areas to assist the UG in producing better results and targeting their resources more effectively.

3.E.2 Within the fifth year after the effective date of the Stormwater Management Plan, the UG shall re-evaluate the overall focus and effectiveness of the dry weather outfall inspection program. The evaluation will be conducted every 5-year permit cycle, will involve setting inspection priorities based on the previous 5-year permit cycle results, and be submitted for review by the permitting authority.

3.E.3 The UG shall provide a list of the inspected outfalls, the number of illicit discharges that were detected, the types of illicit discharges discovered and how discovered, any discharges that were eliminated, and resulting enforcement actions in its Annual Compliance Report to KDHE.

Responsible Department(s): Public Works, Water Pollution Control

Compliance Schedule: Year 1 - 5

Recurrence: Continuous

Report(s): Summary of activities undertaken to detect illicit discharges, the number of illicit discharges that were detected, and the number eliminated.

Evaluation Methodology: Review of SOP techniques (3.B) and protocols and their success in detecting illicit discharges throughout the UG service area.

3.F BMP: Implement a program to televise and inspect illicit discharges and cross connections between the storm sewer and the sanitary sewer systems.

Objective: To develop a program that uses Close Circuit Television (hereinafter "CCTV") to assist in the inspection for illicit discharges or to discover any cross-connections between the storm and separate sanitary sewers outside of the CSO area.

Measurable Goals:

3.F.1 Beginning in the second year after the effective date of the Stormwater Management Plan, during the time when storm sewer lines are being televised for routine maintenance purposes or for capital project needs, the CCTV information will be reviewed for illicit discharges or cross-connection. The UG typically televises approximately 15 miles of storm sewer pipe per year, which is approximately 6% of the 250+ miles of storm sewers currently installed in the UG service area. Any illicit discharges or cross-connections discovered in the storm sewer system will be documented, tracked and disconnected, using the UG's IDDE SOPs and be consistent with any related recommendations contained in the Integrated Overflow Control Plan (hereinafter "IOCP") as guidance.

3.F.2 Beginning in the second year after the effective date of the Stormwater Management Plan, and continuing annually thereafter, the UG shall televise

approximately 20,000 linear feet of sanitary sewer pipe per year in the MS4 service area. Any illicit discharges or cross-connections discovered in the sanitary sewer system will be documented, tracked and disconnected, using the UG's IDDE SOPs and be consistent with any related activities and recommendations contained in the IOCP as guidance. This measure will be coordinated with the UG's IOCP development, the results of which will be provided as part of the reporting requirements under this BMP.

3.F.3 During the second year after the effective date of the Stormwater Management Plan, the UG shall begin reviewing previously collected storm and sanitary sewer CCTV inspection videos for those areas within the MS4 service area (excluding the combined sewer system (CSS) area) at a rate of approximately 20,000 linear feet a year. The video shall be reviewed to determine if there are: 1) illicit discharges in either the storm or sanitary sewers or 2) cross-connections. Any illicit discharges or cross-connections discovered in the separate sanitary sewer system will be documented, tracked and disconnected using the UG's IDDE SOPs and be consistent with any related activities and recommendations contained in the IOCP as guidance.

3.F.4 The UG shall provide a summary report including the number of linear feet of storm and sanitary sewer lines that were televised and the number of illicit discharges or cross-connections that were detected and eliminated in its Annual Compliance Report to KDHE.

Responsible Department(s): Public Works, Water Pollution Control

Compliance Schedule: Year 2 - 5

Recurrence: Continuous

Report(s): Total footage of storm and sanitary sewer lines televised. A list of illicit discharges detected, cross connections discovered, and all that were eliminated will be provided.

Evaluation Methodology: Improvements in efficiency in reviewing CCTV data.

3.G BMP: Maintain a current UG storm sewer mapping system.

Objective: To continually update and maintain a current storm sewer mapping system and the inventory of stormwater outfalls.

Measurable Goals:

3.G.1 By the end of the third year after the effective date of the Stormwater Management Plan, the UG shall convert its existing AutoCAD MS4 maps to GIS.

3.G.2 Beginning in the fourth year after the effective date of the Stormwater Management Plan, the UG shall annually update the GIS maps with Record Drawings detailing modifications to the MS4 system.

Responsible Department(s): Water Pollution Control

Compliance Schedule: Year 3 - 5

Recurrence: Continuous

Report(s): Printout of GIS stormwater map.

Evaluation Methodology: N/A

3.H BMP: Continue participation of the UG's existing Household Hazardous Waste Collection Program.

Objective: To assist UG residents in the proper disposal of household hazardous waste materials through advertisement and participation in the UG's existing Household Hazardous Waste Collection Program (HHW).

Measurable Goals:

3.H.1 The UG shall continue to coordinate seven HHW collection days every calendar year. The UG shall collect the following items at 2443 South 88th Street, or an equivalent location: motor oil, batteries, antifreeze, degreasers, paints, varnishes, solvents, lawn and garden insecticides/pesticides, and household cleaning products.

3.H.2 The UG shall estimate the amount of material that is collected during each event and provide a list in their Annual Compliance Report to KDHE.

3.H.3 The UG shall continue its existing program of collection and disposal of abandoned tires.

Responsible Department(s): Public Works, Technology

Compliance Schedule: Year 1 - 5

Recurrence: 7 days annually

Report(s): Summary of HHW material collected annually (3.H.2).

Evaluation Methodology: Review the amount of HHW collected each year.

4. Construction Site Stormwater Runoff Control

As operator of a Phase 1 MS4, the UG shall develop, implement, and enforce procedures to reduce pollutants in any stormwater runoff to the UG's storm sewers from construction activities that result in a land disturbance of greater than or equal to one (1) acre, and a land disturbance of less than one acre of total land area that is part of a larger common plan of development or sale. These best management practices concern the following overall objectives:

- a. Develop an ordinance, or other legal means, to require erosion and sediment controls, as well as sanctions to ensure compliance with UG and KDHE regulations.
- b. Requirements for construction site owners and operators to implement erosion and sediment control best managements practices.
- c. Requirements for construction site owners and operators to secure authorization to discharge stormwater from construction activities under a UG permit for construction activities that result in a land disturbance of greater than or equal to one (1) acre.
- d. Requirements for construction site owners and operators to secure authorization to discharge stormwater from construction activities under a UG permit for construction activities that result in a land disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than one acre.
- e. Procedures for site inspection and enforcement of control measures.

Best Management Practices (BMPs):**4.A BMP: Implement and revise, where appropriate, SOPs for stormwater plan review/approval, construction site inspections and subsequent enforcement activities.**

Objective: To implement a set of SOPs for detailed plan reviews and approvals, site inspections, and any necessary enforcement actions, consistent with the terms of this SWMP, which will assist in reducing the discharge of pollutants.

Measurable Goals:

4.A.1 Beginning on the effective date of the Stormwater Management Plan, the UG shall implement the Applicable Existing SOPs referenced below.

4.A.2 Within the second year after the effective date of the Stormwater Management Plan, the UG shall review and update, if appropriate, the SOPs for stormwater plan review, site inspections, and enforcement to incorporate changes to these procedures made during the first year of implementation of these programs.

4.A.3 A copy of any updated standard procedures referenced below will be included in the Annual Compliance Report submitted to KDHE for the year in which they are updated.

Responsible Department(s): Public Works, Urban Planning and Land Use

Compliance Schedule: Year 1, 2

Recurrence: One Time (SOPs), Continuous (Implementation)

Applicable Existing SOPs: SWMP-01 (Construction Site Stormwater Runoff Plan Review); SWMP-04 (Construction Site Stormwater Runoff Erosion and Sediment Control Inspection); SWMP-05 (Construction Site Stormwater Runoff Control Erosion Control Enforcement Actions)

Report(s): Copies of the procedures.

Evaluation Methodology: As the program moves forward, annually review and refine the developed SOPs to evaluate its capability to ensure consistency in UG's plan review and approval, construction site inspection services, and enforcement activities.

4.B BMP: Continue use of a tracking system for stormwater plan review/approval, construction site inspections and subsequent enforcement activities.

Objective: To continue the use of a system to track the stormwater plan review and approval process, construction site inspections and any related enforcement actions.

Measurable Goals:

4.B.1 Beginning on the effective date of the Stormwater Management Plan, the UG shall continue its existing tracking system to track plan review and approvals, site inspections and enforcement actions.

4.B.2 A report on stormwater plan review/approval, site inspection, and enforcement activities shall be provided in the Annual Compliance Report submitted to KDHE.

Responsible Department(s): Public Works, Urban Planning and Land Use, Technology

Compliance Schedule: Year 1 - 4

Recurrence: Continuous (Implementation)

Report(s): Documentation of the tracking system activities.

Evaluation Methodology: Evaluate existing tracking system to determine if it captures pertinent and valuable information, allows query ability and provides clear reporting results.

4.C BMP: Provide training to the UG's Erosion and Sediment Control (hereinafter "E&S") Inspection staff.

Objective: To provide training to UG inspection personnel on the requirements of the UG's Erosion and Sediment Control program (E&S).

Measurable Goals:

4.C.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall provide training regarding the UG's new erosion and sediment control standards to key employees. In addition to Erosion & Sediment Control and post-construction BMP inspection staff, this would include the following classifications: Building Inspection, Street Superintendents and Sewer Maintenance. The purpose of the training is to allow employees that are frequently in the field the ability to recognize and report on erosion control problems. Training sessions shall be held every two years and shall be repeated periodically for the benefit of new staff who are placed in these specific positions.

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4.C.2 A copy of the Table of Contents for the training materials and the sign-in sheets containing the names of the attendees for the training sessions described in BMP 4.C.1, will be included in the UG's Annual Compliance Report to KDHE. The detailed training materials will be provided upon request.

Responsible Department(s): Public Works

Compliance Schedule: Year 1

Recurrence: (4.C.1) Every Two Years, (4.C.2) As Appropriate

Report(s): Total number of UG staff required to have training and the actual numbers of staff trained. Copy of the Table of Contents for the training materials and a sign-in sheet containing the names of the attendees for the training sessions will be provided.

Evaluation Methodology: Review procedures and outcomes to ensure the E&S inspection staff are adequately and consistently evaluating and inspecting project sites that meet the regulations.

4.D BMP: Develop a training program for local contractors and owners.

Objective: To develop and implement a training program for local construction site owners, contractors, and site operators.

Measurable Goals:

4.D.1 Within the second year after the effective date of the Stormwater Management Plan, the UG shall sponsor a training session for local construction site owners, contractors, site operators, and installers regarding the proper use of best management measures for construction sites covered by UG's E&S program as well as the rules and requirements of the program. These training sessions will be held every two years.

4.D.2 A copy of the training materials and a sign-in sheet containing the names of the attendees for the training sessions described in BMP 4.D.1 will be included in the UG's Annual Compliance Report to KDHE. The detailed training materials will be available upon request.

Responsible Department(s): Public Works

Compliance Schedule: Year 1-5

Recurrence: (4.D.1) Every Two Years, (4.D.2) As Appropriate

Report(s): Copy of the training materials and a sign-in sheet containing the names of the attendees for the training sessions.

Evaluation Methodology: Review evaluations and comments regarding the quality of training. Assess whether changes to training should be made for the benefit of future attendees.

4.E BMP: Conduct routine construction site inspections.

Objective: To inspect each construction site during construction, or as is necessary based on complaints, to ensure compliance with the UG's Erosion and Sediment Control regulations.

Measurable Goals:

4.E.1 Conduct erosion control inspections based on development activity, number of active construction sites, location and other factors, such as construction season and topography. Emphasis will be for those projects that are actively grading or are in the immediate post-grading stage, sites upstream from Wyandotte County Lake as well as other area ponds and lakes, and sites with the largest disturbed areas.

4.E.2 Whenever practicable, the UG shall conduct an erosion control inspection within 5 working days of receiving a complaint.

4.E.3 The UG shall include a summary of the inspection records in its Annual Compliance Report to KDHE. The records will include information on the number of active sites, the inspection frequencies, the number of complaints received, and a list of any non-compliant sites. Enforcement activities are reported under BMP 4.B.2.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: Continuous

Report(s): Summary of inspection records.

Evaluation Methodology: Evaluate compliance of construction site owners and response to complaints.

5. Post-Construction Stormwater Management Program

As operator of a Phase 1 MS4, the UG shall develop, implement, and enforce procedures and best management practices to address post-construction runoff. These best management practices concern the following overall objectives:

- a. Develop and implement strategies of structural and non-structural BMPs appropriate to the local community, and where appropriate, encourages the use of these BMPs and designs with the goal of maintaining or replicating pre-development runoff characteristics and site hydrology.
- b. Requirement for adequate long-term operation and maintenance of structural stormwater management facilities, including inspection, tracking and enforcement methods.
- c. The ordinance to require long-term operation and maintenance of post-construction controls.

Best Management Practices (BMPs):**5.A BMP: Maintain a set of local standards for post-construction stormwater management and make the standards available to developers, local contractors and the public.**

Objective: To maintain and make available a set of local standards for post-construction stormwater BMPs for local contractors and the general public.

Measurable Goals:

5.A.1 Prior to the effective date of the Stormwater Management Plan the UG adopted a set of local standards for post-construction stormwater management BMPs. During the effective period for the SWMP, the UG will maintain and enforce these local standards and will post on their website a copy of, or a link to, the adopted standards and best management practices outlined in the standards.

Responsible Department(s): Public Works

Compliance Schedule: Year 1-5

Recurrence: Continuous

Report(s): Copy of the most recent version of the standards shall be included with the SWMP.

Evaluation Methodology: Review standards and BMP information annually and update as necessary as a result of compliance or non-compliance by developers, contractors, and the public.

5.B BMP: Implement and revise, where appropriate, SOPs for stormwater plan review/approval, post-construction site inspections and subsequent enforcement activities.

Objective: To implement a set of SOPs for detailed plan reviews and approvals, site inspections, and any necessary enforcement actions, consistent with the terms of this SWMP, which will assist in reducing the discharge of pollutants.

Measurable Goals:

5.B.1 Beginning on the effective date of the Stormwater Management Plan, the UG shall implement the Applicable Existing SOPs referenced below.

5.B.2

Within the second year after the effective date of the Stormwater Management Plan, the UG shall review and update, if appropriate, the SOPs for plan reviews and inspections, and enforcement to incorporate changes to these procedures made during the first year of implementation of these programs.

5.B.3 A copy of any updated standard procedures referenced below will be included in the Annual Compliance Report submitted to KDHE for the year in which they are updated.

Responsible Department(s): Public Works, Urban Planning and Land Use

Compliance Schedule: Year 1, 2

Recurrence: One Time (SOPs), Continuous (Implementation)

Applicable Existing SOPs: SWMP-02 (Post-Construction Stormwater Management Program Plan Review); SWMP-06 (Post-Construction Site Stormwater Management Program BMP Inspection); SWMP-07 (Post-Construction Site Stormwater Management Program Enforcement Procedure)

Report(s): Copies of procedures and checklists.

Evaluation Methodology: As the program moves forward, annually review and refine the procedures to evaluate its capability to ensure consistency in UG's plan review and approval, site inspection services and enforcement activities.

5.C BMP: Develop a tracking system for post-construction sites and implement BMP inspections.

Objective: To develop and maintain an inventory of post-construction stormwater BMPs (both privately and publicly owned) within the MS4 area and to develop a system to track the BMP inspections to reduce the discharge of pollutants to local storm sewers which reach area streams to the maximum extent practicable.

Measurable Goals:

5.C.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall create an inventory of existing publicly and privately owned BMPs. The BMP inventory list will be maintained and updated annually.

5.C.2 Within the first year after the effective date of the Stormwater Management Plan, the UG shall update its system to track the inspection, compliance, or non-compliance of public and privately owned BMPs.

5.C.3 Beginning in the first year after the effective date of the Stormwater Management Plan, the UG shall conduct annual inspections of publically owned post-construction BMPs as required by the ordinance. The frequency of the inspection shall be established and identified in the standard operating procedures (SOP) developed under BMP 5.B. Follow-up inspections of these BMPs will be performed in accordance with the SOP.

5.C.4 Beginning in the first year after the effective date of the Stormwater Management Plan, the UG shall enforce annual operation & maintenance requirements for privately owned BMPs within the MS4 service area, as required by the UG's Code of Ordinances, Article XV of Chapter 8. The enforcement activities will be established and identified in the standard operating procedures developed under BMP 5.B.

5.C.5 Within the third year after the effective date of the Stormwater Management Plan, the UG shall develop and implement a system to store information regarding these BMPs and track the inspection, follow-up activities, and any enforcement action of post-construction BMPs.

5.C.6 The UG shall provide a copy of the post-construction BMP inventory, a summary of the most recent inspection reports, and a list of any enforcement action in its Annual Compliance Report submitted to KDHE.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 3

Recurrence: One Time

Report(s): Summary report of inventory, inspections and enforcement actions.

Evaluation Methodology: Evaluate existing tracking system to determine if it captures pertinent and valuable information, allows for query ability and provides complete reporting results.

5.D BMP: Provide training to UG Inspection staff.

Objective: Provide training to UG inspection personnel on the requirements of the UG's Post-Construction SWMP and to instruct the assigned inspection staff on the proper mechanics and functionality of structural BMPs as well as safety and field awareness issues.

Measurable Goals:

5.D.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall train key employees regarding the new post-construction BMP standards. In addition to Erosion & Sediment Control and post-construction BMP inspection staff, key employees would include the

following job classifications: Building Inspection, Street Maintenance, Public Works Development Coordinator and the Public Works Stormwater Coordinator. These training sessions shall be repeated for the benefit of new staff.

5.D.2 A copy of the training materials and a sign-in sheet containing the names of the attendees for the training session described in BMPs 5.D.1 will be included in the UG's Annual Compliance Report to KDHE.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: (5.D.1 and 5.D.2) As Necessary

Report(s): Copy of the training materials and a sign-in sheet containing the names of the attendees for the training sessions.

Evaluation Methodology: Review procedures and outcomes to ensure the inspection staff are adequately and consistently evaluating and inspecting BMP sites that meet the regulations.

5.E BMP: Develop a training program for local property owners, designers and developers.

Objective: To develop and implement a training program for local BMP project site owners, designers and developers.

Measurable Goals:

5.E.1 Within the second year after the effective date of the Stormwater Management Plan, the UG shall sponsor a training session for architects / engineers / developers / contractors and owners of stormwater structural BMPs regarding the maintenance, inspection and enforcement program. These training sessions will be held every two years.

5.E.2 A copy of the training materials and a sign-in sheet containing the names of the attendees for the training sessions described in BMP 5.E.1 will be included in the UG's Annual Compliance Report to KDHE, appropriate.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: (5.E.1, 5.E.2) Every Two Years

Report(s): Copy of the training materials and a sign-in sheet containing the names of the attendees for the training sessions.

Evaluation Methodology: Review evaluations and comments regarding the quality of training. Assess whether changes to training should be made for the benefit of future attendees.

6. Pollution Prevention/Good Housekeeping

As operator of a Phase 1 MS4, the UG shall develop, implement, evaluate and modify, as necessary, an operation, maintenance, and training program for municipal operations and municipally owned/operated facilities consistent with the following overall goals:

- a. Operation and maintenance programs, including activities, schedules, SOPs and inspection procedures which include provisions and controls to reduce pollutant discharges to the MS4.
- b. Materials, including fertilizers, herbicides and pesticides shall be applied according to manufacturer's recommendations.
- c. Proper disposal of waste materials.

Best Management Practices (BMPs):**6.A BMP: Implement and revise, where appropriate, the UG's SOP for application of pesticides, herbicides and fertilizers (hereinafter "PHF") on UG property.**

Objective: To implement the UG's SOP which describes the application of PHFs used on UG property and its existing PHF tracking system. To require integrated pest management by all contractors performing lawn care maintenance work on UG property.

Measurable Goals:

6.A.1 Beginning on the effective date of the Stormwater Management Plan, the UG shall implement the Applicable Existing SOPs referenced below.

6.A.2 Within the second year after the effective date of the Stormwater Management Plan, the UG will review, and update if appropriate, its SOP for application of PHGs to incorporate changes to those procedures made during the first year of implementation of this program.

6.A.3 Within the second year after the effective date of the Stormwater Management Plan, the UG shall review and modify their specifications and contracts for lawn care maintenance at public buildings and incorporate integrated pest management into the contract specifications.

6.A.4 A copy of any updated version of the SOP referenced below shall be included in the Annual Compliance Report to KDHE for the year in which it was updated. The UG shall provide a copy of the most recent PHF application procedures (SOP) and lawn maintenance contract specifications, a list of the amounts of PHFs applied to UG property, and a list of the certified contractors who applied PHF to UG property in each Annual Compliance Report to KDHE.

Responsible Department(s): Parks & Recreation, Procurement

Compliance Schedule: Year 1,2

Recurrence: One Time (6.A.3), Continuous (6.A.1, 6.A.4)

Applicable Existing SOP: SWMP-08 (Pesticide, Herbicide, and Fertilizer Application)

Report(s): Copy of SOP, PHFs applied on UG property, and list of certified applicators/contractors.

Evaluation Methodology: As the program moves forward, annually review and refine the developed SOP to evaluate its capability to ensure consistency in application of PHFs.

6.B BMP: Continue to operate the UG's existing vehicle washing facility.

Objective: Continue to operate a vehicle washing facility which collects and disposes of wash water in the sanitary sewer system.

Measurable Goals:

6.B.1 Beginning on the effective date of the Stormwater Management Plan, the UG continue its existing program of washing of UG vehicles at its existing vehicle wash facility, currently located at 50th Street and State Avenue. The current procedures will be reviewed and updated as necessary to reflect industry best practices.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: Continuous

Applicable Existing SOP: SWMP-03 (Vehicle Washing)

Report(s): A copy of any updated standard operating procedure and an inventory of all vehicle washing facilities.

Evaluation Methodology: Review the effectiveness of collecting and disposing of wash water consistent with the goal of maintaining water quality.

6.C BMP: Review and refine, if UG deems it necessary, the UG's tracking system for street sweeping. Implement SOP for street sweeping.

Objective: To implement the UG's existing street sweeping SOP and to review and refine the UG's tracking program which describes route information, prioritization method, cleaning frequencies and disposal of material collected.

Measurable Goals:

6.C.1 Beginning on the effective date of the Stormwater Management Plan, the UG shall implement the Applicable Existing SOP referenced below. Within the first year after the effective date of the Stormwater Management Plan, the UG will review and refine its current system to track street sweeping activities. The UG shall track the route classification and the amount of material collected on a monthly basis.

6.C.2 Within the second year after the effective date of the Stormwater Management Plan, the UG shall perform a review of its street sweeping SOP, referenced below. This evaluation will include such items as reviewing cleaning frequencies, route optimization strategies, quantity and type of collected material, and a cost/benefit analysis. The UG will prepare a memorandum detailing the results of the review. If UG deems it necessary, UG will make modifications to the SOP following the evaluation process.

6.C.3 The UG may continue the use of the transfer station located at its central garage, 50th Street and State Avenue, for street sweeping materials. Storage of street sweepings at the transfer station shall be in appropriately designed containers.

6.C.4 The UG shall include a list of dates, route classifications and material collected on a monthly basis in its Annual Compliance Report to KDHE.

6.C.5 A copy of any updated version of the SOP referenced below shall be included in the Annual Compliance Report to KDHE for the year in which it was updated.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: (6.C.1, 6.C.2) One Time, (6.C.3) Continuous, (6.C.4) Annually

Applicable Existing SOP: SWMP-09 (Street Sweeping)

Report(s): Total amount of material collected monthly and a copy of latest street sweeping procedures.

Evaluation Methodology: Annually review the efficiency of street sweeping plan and total amount of waste material collected. As the program moves forward, annually review and refine the developed SOP to evaluate its effectiveness.

6.D BMP: Provide training to UG employees on good housekeeping activities related to stormwater management and how to reduce pollutants to the MS4.

Objective: To provide training to UG employees that will educate them on stormwater management, water quality, and how to reduce pollutants to the MS4.

Measurable Goals:

6.D.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall prepare and distribute Stormwater Pollution Prevention training materials available to UG employees through e-mails and the UG's Intranet site.

6.D.2 A copy of the training materials will be included in the UG's Annual Compliance Report to KDHE.

Responsible Department(s): Public Works, Human Resources

Compliance Schedule: Year 1 - 5

Recurrence: Annually

Report(s): Copy of training materials.

Evaluation Methodology: Evaluate the effectiveness of the training materials based on employee feedback and observed behavior changes.

6.E BMP: Continue the existing curb inlet inspection and cleaning program.

Objective: To reduce the discharge of pollutants to area streams from the MS4 to the maximum extent practicable by developing a wide-ranging inlet inspection and cleaning program.

Measurable Goals:

6.E.1 Beginning on the effective date of the Stormwater Management Plan, the UG shall continue its existing inlet inspection program by performing approximately 5,000 inspections per year.

6.E.2 Beginning on the effective date of the Stormwater Management Plan, the UG shall continue its existing inlet cleaning program by cleaning approximately 3,000 inlets per year. The number on inlets cleaned is dependent upon observations and the results of the inspection process conducted under BMP 6.E.1.

6.E.3 Within the third year after the effective date of the Stormwater Management Plan, the UG shall re-evaluate the overall focus and effectiveness of the existing curb inlet inspection and cleaning program. This information shall be used to assist the UG in prioritizing its program to reduce pollutant discharges to the maximum extent practicable for the remaining years in the permit with the information available.

6.E.4 The UG shall provide a summary report of the curb inlets that are inspected and cleaned in its Annual Compliance Report to KDHE.

Responsible Department(s): Public Works, Water Pollution Control

Compliance Schedule: Year 1 - 5

Recurrence: Continuous

Report(s): Total number of curb inlets inspected/cleaned each year.

Evaluation Methodology: Review the cleaning reports and the techniques employed in the inspection and cleaning of inlets as well as the process used to prioritize inspection and cleaning activities.

6.F BMP: Review and update, if needed, the UG's tracking system for inlet inspections and cleaning. Implement SOP for inlet inspections and cleaning.

Objective: To review and update the UG's existing inlet inspection and cleaning tracking program which describes route information, prioritization method, cleaning frequencies and disposal of material collected. To implement the SOP for inlet inspections and cleaning.

Measurable Goals:

6.F.1 Beginning on the effective date of the Stormwater Management Plan, the UG shall implement the Applicable Existing SOP referenced below.

6.F.2 During the first two years after the effective date of the Stormwater Management Plan, the UG shall review and refine its current system to track inlet inspections and cleaning, and will update, if appropriate, the SOP referenced below. During the third year, the UG shall incorporate inlet inspections and cleaning into the existing maintenance work order system.

6.F.3 The UG shall perform a review of its inlet inspection and cleaning procedures and prepare a memorandum detailing the results during the third year.

6.F.4 The UG shall provide a copy of its procedures review memorandum in its Annual Compliance Report to KDHE. A copy of any updated version of the SOP referenced below shall be included in the Annual Compliance Report to KDHE for the year in which it was updated.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: (6.F.1, 6.F.2, 6.F.3) One Time, (6.F.4) Annually

Applicable Existing SOP: SWMP-10 (Stormwater Inlet Inspection and Cleaning)

Report(s): A copy of latest inspection/cleaning procedures.

Evaluation Methodology: As the program moves forward, annually review and refine the SOP and the efficiency of inlet inspection and cleaning plan.

6.G BMP: Create an inventory of UG-owned/operated or UG-operated buildings and facilities. Review permit coverage and SWPPPs for regulated sites.

Objective: To create an inventory of all UG-owned/operated or UG-operated buildings and facilities. Based upon this inventory, to determine which sites should have permit coverage from KDHE and a SWPPP in place, and which sites should not. For the regulated sites, to confirm permit coverage and collect SWPPPs for review and comment.

Measurable Goals:

6.G.1 Within the first year after the effective date of the Stormwater Management Plan, the UG will update its inventory of UG-owned/operated and/or

UG-operated buildings and facilities. The list will be categorized into: (i) those sites that are included within the definition at 40 CFR 122.26 paragraphs (b)(14)(i) through (xi) (hereinafter, "industrial sites") and (ii) non-regulated sites.

6.G.2 Within the second year after the effective date of the Stormwater Management Plan, for those sites categorized as industrial sites, the UG will alert the appropriate department that the site may require coverage under KDHE's General Permit for Stormwater Runoff from Industrial Activity and will request information on the site's status in this regard. If the site is covered at the time of notification, the UG will request a copy of the site's SWPPP and will provide suggestions for improvements, as appropriate.

6.G.3 Within the third year after the effective date of the Stormwater Management Plan, for those sites that state that they do not have coverage during the initial notification in BMP 6.G.2, the UG will follow-up with the appropriate department to ascertain whether the site is covered by the General Permit, and, if not, the reason it is not. If the site is not covered, the UG will provide assistance to the department in obtaining the proper permit and developing the required site SWPPP, as appropriate.

6.G.4 The UG shall provide a copy of the updated inventory as well as a list of departments notified and any follow-up conducted in its Annual Compliance Report to KDHE.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: (6.G.1, 6.G.2, 6.G.3) One Time, (6.G.4) Annually

Report(s): A copy of the latest inventory, departments notified, and follow-up performed.

Evaluation Methodology: As the program moves forward, annually review whether all regulated sites have permit coverage and have SWPPPs in place.

6.H BMP: Monitor good housekeeping at non-regulated sites.

Objective: Based upon the inventory developed in BMP 6.G, to visit each UG-owned/operated or UG-operated building or facility that is not categorized as an industrial sites in order to recommend stormwater-related good housekeeping improvements.

Measurable Goals:

6.H.1 Within the second year after the effective date of the Stormwater Management Plan, for those sites that are not categorized as industrial sites pursuant to BMP 6.G.1 (hereinafter "non-regulated sites"), the UG will develop a schedule whereby each site will be visited once during each five year permit cycle.

6.H.2 Within the third year after the effective date of the Stormwater Management Plan, the UG shall begin visiting these non-regulated sites. During these visits, the UG will provide educational materials regarding good housekeeping practices meant to reduce the risk of non-stormwater discharges to the MS4 system, will discuss proper management practices with the manager of the site, and will recommend improvements that could be made on-site with regard to stormwater management. The UG will continue these site visits until all are reached.

6.H.3 The UG shall provide a copy of its schedule and copies of its educational materials in its Annual Compliance Report to KDHE. The UG shall provide a copy of any written recommendations made for a particular site upon request.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: (6.H.1) One Time, (6.H.2) Ongoing (Implementation) and (6.H.3) Annually

Report(s): A copy of UG's schedule and educational materials.

Evaluation Methodology: After all sites are visited once, review the educational materials and make needed improvements in information provided.

7. Industrial Activity Stormwater Runoff Management

As operator of a Phase 1 MS4, the UG shall develop, implement, evaluate and modify, as UG deems necessary, a program for addressing discharges from industrial facilities, included in 40 CFR § 122.26(d)(2)(iv)(C) to the MS4 consistent with the following overall objectives:

- a. Develop and implement a program to identify and inspect these facilities and sites to review whether there are effective stormwater control measures in place at the site.
- b. Where appropriate, take enforcement action to address illicit discharges from those identified sites consistent with UG's IDDE program (discussed above).

Existing Program Activities

The UG does not have an established industrial runoff management program as it is not a current permit requirement to-date. The UG however, does monitor those sites which are part of the sanitary sewerage pre-treatment program. Since the UG's jurisdiction includes industrial areas that are within the combined sewer system area (outside of the regulated MS4 service area), compliance with these pre-treatment requirements have had a positive effect in stormwater quality during rainfall events that trigger combined sewer overflows.

Best Management Practices (BMPs):

7.A BMP: Develop a Standard Operating Procedure (SOP) for stormwater plan review/approval, industrial site inspections, review of stormwater control measures during those inspections, and subsequent enforcement activities.

Objective: To develop a set of Standard Operating Procedures (SOP) for detailed plan reviews and approvals, site inspections, review of stormwater control measures, and any subsequent enforcement actions deemed necessary by UG.

Measurable Goals:

7.A.1 By no later than March 31, 2013, the UG shall create an SOP for stormwater plan review and approval of industrial sites, including a visual review of the site and interviews with management at the facility.

7.A.2 By no later than March 31, 2013, the UG shall create an SOP for the inspection of industrial sites.

7.A.3 By no later than March 31, 2013, the UG shall create an SOP for carrying out enforcement actions against any industrial site which has been found in violation of UG ordinances. The SOP will also identify the steps necessary to inform KDHE of facilities that may require state action.

7.A.4 A copy of the standard operating procedures described in BMPs 7.A.1 thru 7.A.3 will be included in the Annual Compliance Report submitted to KDHE.

Responsible Department(s): Public Works, Legal

Compliance Schedule: Year 1

Recurrence: One time

Report(s): Copies of all SOPs.

Evaluation Methodology: Annually review and refine, if the UG deems it necessary, the developed SOPs to evaluate their capability to ensure consistency in UG's plan review and approval, site inspections, and enforcement activities.

7.B BMP: Create and maintain an inventory of Industrial facilities.

Objective: To create an inventory of Industrial facilities as defined by 40 CFR 122.26(b)(14), which is to be maintained and updated on an annual basis.

Measurable Goals:

7.B.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall update its industrial facilities list to include municipal landfills, hazardous waste treatment, storage and disposal facilities (TSDs), industries subject to reporting requirements pursuant to SARA Title III Section 313, facilities as defined by 40 CFR 122.26(b)(14), and those sites that the UG determines are contributing a substantial loading of pollutants to the MS4. The list shall be updated on an annual basis.

7.B.2 A copy of the list of industrial facilities, including their classification per 40 CFR 122.26(b)(14) shall be included in the UG's Annual Compliance Report to KDHE.

Responsible Department(s): Public Works, Geospatial

Compliance Schedule: Year 1 - 5

Recurrence: Continuous

Report(s): List of all industrial facilities noted above within UG's MS4 service area.

Evaluation Methodology: Completion of list.

7.C BMP: Implement an Industrial facility inspection program.

Objective: To inspect each industrial site to ensure compliance with the UG's ordinances.

Measurable Goals:

7.C.1 Within two years of after the effective date of the Stormwater Management Plan, of the industrial sites described in 7 above, the UG shall begin inspecting 25 percent (%) of these sites per year. A priority list of facilities based upon industrial classification shall be established as a predictor of potential pollutant loadings. The list may be modified as a result of subsequent inspections.

7.C.2 Prior to commencing with inspections, all inspectors and UG personnel assigned to conduct inspections under this program shall be trained in accordance with the measurable goals identified under the IDDE Program, BMP Number 3.D.

7.C.3 A copy of the annual inspection reports will be retained for three years. A summary of the annual inspection reports will be included in the UG's Annual Compliance Report to KDHE.

Responsible Department(s): Public Works

Compliance Schedule: Year 2 - 5

Recurrence: Continuous

Report(s): Summary of inspection records.

Evaluation Methodology: Evaluate compliance of facility owners.

7.D BMP: Adopt legal authority for inspection of industrial facilities, review of on-site stormwater control measures, and subsequent enforcement.

Objective: To review and revise, if the UG deems it necessary, UG's ordinances to allow for UG inspection of industrial facilities, review of their stormwater control measures, and the institution of enforcement actions in appropriate cases.

Measurable Goals:

7.D.1 Within the second year after the effective date of the Stormwater Management Plan, the UG shall review its current Code of Ordinance, and adopt, if UG deems it necessary, a new ordinance that authorizes the UG to require the industries described in 7 above to address any discharges to the MS4, to install or undertake stormwater control measures on their properties, and, if otherwise required by federal or state law, to conduct monitoring, with a copy of any results submitted to the UG.

7.D.2 A copy of the review results, and any ordinance activities, will be included in the UG's Annual Compliance Report to KDHE.

Responsible Department(s): Public Works

Compliance Schedule: Year 2 - 5

Recurrence: One Time

Report(s): Summary of review and ordinance activities.

Evaluation Methodology: Evaluate adequacy of ordinance to allow for facility inspections.

8. TOTAL MAXIMUM DAILY LOAD (TMDL) REGULATED POLLUTANTS AND PRINCIPAL POLLUTANTS OF CONCERN

As operator of a Phase 1 MS4, the UG shall develop, implement, evaluate and modify, as necessary, a stormwater management plan, which includes practical and feasible BMPs and a monitoring program, to assess the effectiveness of the stormwater management activities and BMPs that have been implemented to attenuate the discharge of the Total Maximum Daily Loads (TMDL) regulated pollutants and Principal Pollutants of Concern (PPOC) indentified in the UG's NPDES permit. Actions shall be taken to insure that the UG is in compliance with the following overall objectives:

- a. Develop and implement a stormwater management program, including specific BMPs, which will reduce the loading from the regulated TMDL pollutants.
- b. Develop and implement a program to monitor and collect stormwater samples at various intervals and frequencies identified in the NPDES permit.
- c. Develop and implement procedures to collect and analyze stormwater samples.
- d. Review data and determine water quality trends.

The UG continues to implement its Wet Weather Control Plan to reduce the number overflow events and the quantity of sanitary sewerage which enters the Kansas River during combined sewer overflow (CSO) and sanitary sewer overflow (SSO) events within the service area. The ongoing and future activities include studies to identify areas of overflows and their causes, and the construction of capital improvement projects to address overflows as a means to reduce the discharge of pollutants to the maximum extent practicable.

Best Management Practices (BMPs):

8.A BMP: To develop and implement Best Management Practices which will reduce TMDL regulated pollutants (Bacteria), to the maximum extent practicable, from entering the Kansas River.

Objective: To develop and implement BMP programs to reduce the amount of TMDL regulated parameters and Principal Pollutants of Concern that enter the Kansas River.

Measurable Goals:

8.A.1 Within the first after the effective date of the Stormwater Management Plan, the UG shall implement the following BMPs:

- A pet waste brochure will be developed for public education and dissemination. The brochure will encourage pet owners to pick up the waste as well as provide other pollution prevention tips for pet owners. The brochure will be posted on the UG website and also be printed to be placed in City Hall, the public libraries, and other public venues, such as Community Centers and the Neighborhood Resource Center.

- Within the Kansas River drainage basin, priority attention will be given to regulating septic tank systems maintenance, installation, and usage. Response to complaints received regarding improper discharges or surfacing sewage related to septic system failures will be given top priority for investigation and response. Continue regulating septic systems in accordance with the UG's Code of Ordinances, Chapter 30, Article VII and maintain records of investigation and final disposition of non-compliant systems.
- Beginning in the second year after the effective date of the Stormwater Management Plan, the UG will implement the IDDE dry-weather inspection program required by BMP 3.E above to prioritize those drainage areas and streams within the Kansas River drainage basin. The UG will document and report all illicit discharges found and eliminated.

8.A.2 All activities, documents and reports for the BMPs identified above will be included in the UG's Annual Compliance Report to KDHE.

Responsible Department(s): Public Works, Public Relations

Compliance Schedule: Years 1 - 5

Recurrence: Continuous

Report(s): Copies of all brochures created and distributed, list of septic system complaints and disposition activities, and a summary of all illicit discharges inspected and eliminated.

Evaluation Methodology: Reduction in bacteria concentrations.

Affected Parameters: Bacteria (E. Coli)

8.B BMP: Undertake activities to reduce stormwater impacts on Wyandotte County Lake.

Objective: To implement and enforce best management practices within the lake's watershed, by reducing the discharge of pollutants, to the maximum extent practicable, in order to protect the integrity of Wyandotte County Lake. To assess the condition of the lake over the 5-year permit period.

8.B.1 During the first year after the effective date of the Stormwater Management Plan, the UG shall assess the land use in the watershed of the lake to develop a baseline for existing build-out conditions, using available data, sampling information, and any existing surveys of the lake. This initial assessment will include the original bathymetric survey conducted in 2010 by the Kansas Biological Survey.

8.B.2 Beginning in the first year after the effective date of the Stormwater Management Plan, the UG shall commence gathering and analyzing samples of the water in the southern and eastern tributaries entering the lake during four (4) wet weather events per year. Parameters tested shall include Total Phosphorus,

total suspended solids (TSS), Total Nitrogen (calculated), TKN, nitrates + nitrites, ammonia, biochemical oxygen demand (BOD), and pH. Daily rainfall amounts from nearby rain gauges for the preceding two week period will be reported.

8.B.3 Beginning in the first year after the effective date of the Stormwater Management Plan, the UG shall give high priority to sites located within the Wyandotte County Lake watershed when it comes to enforcing program elements and best management practices identified under the Construction Site Stormwater Run-off Control and Post-Construction Stormwater Management Program minimum control elements.

8.B.4 Within the fifth (5th) year after the effective date of the Stormwater Management Plan, the UG shall conduct a follow-up bathymetric survey of the lake. The UG will also undertake a land use and build-out assessment in the lake watershed to provide a comparison to the baseline data developed in the first year.

8.B.5 Beginning the first year after the effective date of the Stormwater Management Plan, the UG shall take Secchi disk depth readings at up to three (3) locations in the main body of the lake approximately one week before Memorial Day, Independence Day and Labor Day.

Responsible Department(s): Public Works, Water Pollution Control

Compliance Schedule: Years 1-5

Recurrence: One Time (8.B.1, and 8.B.4), Continuously (8.B.2, 8.B.3 and 8.B.5)

Report(s): Provide a copy of the sampling results from the wet weather sampling program and lake Secchi disk depths. The UG will keep records on enforcement action and make these records available upon request. Provide a summary of the results of the bathymetric survey and land use assessment conducted during the fifth year.

Evaluation Methodology: Evaluate parameter, Secchi disk, and sediment data to determine the effect of BMPs on pollutants levels entering the lake. Modify program or develop additional best management practices in the area to continue protecting the lake quality.

Affected Parameters: Phosphorus, Sediment

9. WET WEATHER MONITORING PROGRAM

As operator of a Phase 1 MS4, the UG shall develop, implement, evaluate and modify, as necessary, a wet weather monitoring program for the Principal Pollutants of Concern (PPOCs) and other parameters listed in the current NPDES Permit to assess the effectiveness of the stormwater management activities and BMPs that have been implemented that comply with the following overall objectives:

- a. Develop and implement a program to monitor and collect storm water samples during wet weather at several outfall and stream locations.
- b. Develop and implement procedures to collect and analyze stormwater samples during wet weather.
- c. Review data and determine water quality trends.

Best Management Practices (BMPs):

9.A BMP: Implement SOPs to address monitoring of Principal Pollutants of Concern and other water quality parameters.

Objective: To implement SOPs which detail the implementation of a wet weather monitoring program and analysis of certain Principal Pollutants of Concern and specific parameters identified in the current NPDES permit.

Measurable Goals:

9.A.1 Beginning on the effective date of the Stormwater Management Plan, the UG shall implement the Applicable Existing SOPs referenced below.

9.A.2 Within the second year after the effective date of the Stormwater Management Plan, the UG shall review and update, if appropriate, the SOPs referenced below to incorporate changes to these procedures made during the first year of implementation of this program.

9.A.3 The UG shall provide a copy of the Monitoring Plan and data analysis procedures in its Annual Compliance Report to KDHE in the year in which the procedure was updated.

Responsible Department(s): Public Works, Water Pollution Control

Compliance Schedule: Year 1, 2

Recurrence: One Time

Applicable Existing SOP: SWMP-15 (Wet Weather Monitoring Program – Wet Weather Monitoring); SWMP-16 (Wet Weather Monitoring Program – Data Analysis)

Report(s): Copies of procedures and the results of the review of the current Wet Weather Monitoring Plan.

Evaluation Methodology: As the overall program moves forward, annually review and refine if the UG deems it necessary, the developed SOPs to evaluate their capability to ensure consistency and accuracy in UG's sampling and analysis procedures.

9.B BMP: Develop a tracking system for wet weather monitoring activities.

Objective: To develop a system to track the results of the wet weather monitoring program.

Measurable Goals:

9.B.1 Within six months after the effective date of the Stormwater Management Plan, the UG shall develop a spreadsheet to track the water quality results and each sample location.

Responsible Department(s): Public Works, Water Pollution Control

Compliance Schedule: Year 1

Recurrence: One Time

Report(s): N/A

Evaluation Methodology: Review tracking system to ensure that the water quality results are clear, useful, and reliable. Make modifications to the system if appropriate.

9.C BMP: Conduct water quality analyses of stormwater discharges to assess the effectiveness of implemented BMPs and stormwater pollution prevention actions.

Objective: To review monitoring data for water quality trends and to analyze the information to determine the effectiveness of BMPs and the overall health of the watershed.

Measurable Goals:

9.C.1 Beginning in the first year after the effective date of the Stormwater Management Plan, the UG shall annually prepare a memorandum which includes an analysis of the monitoring results. The UG will provide an analysis and interpretation of the results of the effectiveness of the various BMPs and make adjustments if necessary.

9.C.2 The UG shall provide a copy of the data analysis in its Annual Compliance Report to KDHE.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: Annual

Report(s): Summary of water quality trend analysis memorandum.

Evaluation Methodology: Evaluate trends to assess water quality impacts and review possible changes to BMPs and stormwater management activities to reduce PPOCs, and make modifications, if required.

10. STORMWATER MANAGEMENT PROGRAM

As operator of a Phase 1 MS4, the UG shall develop, implement, evaluate, and modify if necessary, a Stormwater Management Program to manage the activities and requirements, to the maximum extent practical, that reduce the discharge of pollutants to area streams, protect water quality and complies with the Clean Water Act, consistent with the following overall goals:

- a. Develop and implement a stormwater management program, including specific BMPs which will reduce the loading from the regulated and principal pollutants of concern.
- b. Establish a Stormwater Management Team that will oversee stormwater related activities and financial issues, provides guidance, and evaluates and recommends improvements to the program.
- c. Conduct watershed studies and a stormwater master plan to identify future capital improvement needs.

Best Management Practices (BMPs):

10.A BMP: Hire a Stormwater Coordinator.

Objective: Create and fill a new position whose primary responsibility will be to oversee the day to day operation of the Stormwater Management Program.

Measurable Goals:

10.A.1 Within the first year after the effective date of the Stormwater Management Plan, the UG shall create the position of Stormwater Coordinator. This individual will primarily be responsible for overseeing the implementation of the Stormwater Management Plan. This position will be overseen by the Deputy County Engineer in charge of the Stormwater Runoff Management Program.

10.A.2 After the position is established, and contingent upon the availability and interest of qualified applicants, the UG shall fill the position of Stormwater Coordinator. It is expected that this position will occasionally be vacant due to staff turnover at the UG. During those periods, the UG will endeavor to name an individual to temporarily assume the responsibilities of this position until such time that an individual can be named to the position.

Responsible Department(s): Public Works, HR Dept.

Compliance Schedule: Year 1

Recurrence: N/A

Report(s): Information on the staffing of this position will be included in the annual report.

Evaluation Methodology: N/A

10.B BMP: Create committees which will provide administrative oversight, coordination and direction for the UG's Stormwater Management Program.

Objective: To establish Committees to provide oversight and guidance during the implementation of the UG's Stormwater Management Program. The purpose of these committees shall be to develop a clear and consistent message regarding MS4 as it relates to overall program management, to help direct public education activities, to coordinate information tracking and mapping, and to oversee the good housekeeping measures implemented as part of this plan.

Measurable Goals:

10.B.1 Within the first year after the effective date of the Storm Water Management Plan, a Stormwater Executive Committee will be formed, which will be comprised of the UG's Public Works Director, the County Engineer, the Water Pollution Control Division Director, and, to the extent the position has been filled, the Stormwater Coordinator. The committee will be involved in funding and planning decisions, will ensure communications between departments, will oversee the implementation of the various measures and the tracking of all activities, and will provide direction and guidance to staff during the program process.

10.B.2 Within the first year after the effective date of the Storm Water Management Plan, the Stormwater Executive Committee will consider the formation of additional committees to address public education, information tracking, mapping and good housekeeping measures.

10.B.3 For all committees, minutes will be prepared. Minutes will be retained for a minimum of three years, and will be provided to the public upon request.

Responsible Department(s): Public Works, Public Relations

Compliance Schedule: Year 1 - 5

Recurrence: Continuous

Report(s): N/A

Evaluation Methodology: The Public Works Director, or his designee, shall conduct an annual evaluation of the various Stormwater Committees to determine their effectiveness in implementing the UG's SWMP.

10.C BMP: Conduct an annual financial analysis of the stormwater program.

Objective: To conduct an annual financial analysis which will assess the implementation costs of the UG's Stormwater Management Program and will consider the potential means for obtaining adequate funding.

Measurable Goals:

10.C.1 Beginning in the second year, the UG shall conduct an analysis of the future program funding needs and expenses as well assessing the availability of funds and revenue for the program as part of the annual budget development process. If future expenditures exceed revenue, recommendations will be identified to address the gap in funding to the maximum extent practicable.

10.C.2 A copy of the financial analysis will be included in the UG's Annual Compliance Report to KDHE.

Responsible Department(s): Public Works

Compliance Schedule: Year 1 - 5

Recurrence: Annually

Report: Copy of the financial analysis.

Evaluation Methodology: N/A



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Construction Site Stormwater Runoff Plan Review

SOP Identification No: SWMP-01 BMP No: 4.A.1

Revision Date: Aug. 8, 2012 Approved/Date: _____

Primary Department: Urban Planning and Land Use

PURPOSE:

To provide uniform review criteria for construction site stormwater runoff control plans.

CONTACT:

Engineering Supervisor, Urban Planning and Land Use (913) 573-5723
Development Support Specialist, Urban Planning and Land Use (913) 573-8664

PROCEDURES:

1. Complete "Project Application" packets, including Construction Plans submitted by Developers and Business Owners (through the Design Engineer company), shall be processed and logged in by the Unified Government's Development Support Specialist.
2. Submitted Plans shall be distributed to the Engineering Supervisor for assignment to a Project Engineer for review.
3. The submitted Plans shall be reviewed to determine whether or not they are in compliance with the Unified Government's Land Disturbance & Erosion Control Guidelines and its stormwater design criteria. This review shall be accomplished by following the checklist as part of the Unified Government's *Guidelines for Preparing Erosion Control Drawings for Land Development (2009)* and *Storm Drainage Design Criteria for Private Developments*.
4. Written review comments, that list and explain required revisions for those items that are not in compliance with the Unified Government's Design Criteria, Guidelines, and Ordinances, shall be sent to the Design Engineer for the Developer or Business Owner.
5. The Design Engineer shall be instructed to revise the Plans as required, to provide a transmittal letter that identifies how each of the Unified Government's review comment was addressed, and to resubmit the Construction Plans.

6. Repeat Steps 1 thru 5 for Construction Plan resubmittals until all aspects of the Plan set are in compliance with the Unified Government's criteria.
7. When all aspects are reviewed and found to be in compliance with the criteria, a memorandum documenting that plans are approved is issued to the Development Support Specialist and the project's Design Engineer in a timely manner.

APPLICABLE REFERENCE INFORMATION

1. Unified Government's *Guidelines for Preparing Erosion Control Drawings for Land Development (2009)*.
2. Unified Government's *Post-Construction Stormwater Treatment Ordinance*.
3. American Public Works Association/Mid-America Regional Council (APWA/MARC) *Manual for Best Management Practices for Stormwater Quality, August 2009 Edition*.
4. Unified Government's *Directions for Storm Drainage Review*.
5. Unified Government's *Storm Drainage Design Criteria for Private Developments*.

Design Guidelines for Erosion and Sediment Control

SECTION 1 DESIGN CHECKLIST

1.1 General: This section provides checklists and tables that may be used for quality assurance reviews. Although generally redundant with the rest of the design guidelines some requirements are contained only in this section.

- A. Interpretation: This checklist is intended to be a tool to evaluate whether the erosion and sediment control plans meet these design guidelines. To that end a literal interpretation is encouraged. However, complete compliance may not be possible to achieve on all sites. In such a case the rule of evaluation should be that the maximum practicable compliance has been achieved for the performance goals in *Section 3 Performance Goals*.

- B. Definitions: Where found in the checklist the following terms have specific meanings indicated:
 - 1. Catchment length: The distance that a drop of water travels between the uphill ridgeline and a linear control.
 - 2. Contractor area: defined in *Section 3 Access Limits and Contractor Areas*
 - 3. Early work opportunity: Work that may be conducted prior to mass grading without affecting the overall duration of the project.
 - 4. Inactive area: Any part of the project site that may be reasonably managed by the contractor to not require further construction for a 14 days or longer. The need for subsequent construction at a location does not affect the inactive status so long as the delay is reasonably expected to be 14 days. Inactive areas usually occur whenever there is a change in the contractor’s use of the site.
 - 5. Milestone: An identifiable point in the project schedule when the contractor’s use of any portion of the site pauses, changes or may pause or change. Typical milestones that may affect erosion control needs are the beginning or completion of mass grading, building “top out” on small or medium site construction, or traffic routing phases on roadway projects. (Linear pipeline projects have nearly daily changes of the work zone; for linear projects a single drawing with a specialized construction sequence will convey multiple milestones.)

Table 1
Erosion and Sediment Control Checklist
General

Design Guidelines for Erosion and Sediment Control

Table 1	
Erosion and Sediment Control Checklist	
1	A series of erosion control drawings is provided. Each drawing is related to a milestone in the contractor's use of the site. Exceptions include linear projects, such as a utility extension, or sites under one acre; these may have a single drawing. Single family home site may use a standard template rather than a custom drawing.
2	Designer is a P.E. with relevant continuing education in erosion and sediment control.
3	A written construction sequence is included on the erosion control plans.
Specifications	
4	The project specification addresses the inspection and maintenance of the BMPs used. Use of APWA 2150 satisfies this requirement.
5	The project specification addresses pollution prevention through good housekeeping, including spill response. Use of APWA 2150 satisfies this requirement.
Site analysis	
6	A separate site analysis is provided. The site analysis includes both a written project description and a drawing analyzing flow patterns and slope lengths based on existing contours.
7	The written description identifies the location, nature and size of the project and the size of the area to be disturbed.
8	The written description identifies sensitive or impaired downstream waters, as defined by a government entity.
9	The written description identifies the soil type on the project site and highlights highly erodible soil types.
10	The drawings indicate the limit of the proposed disturbance. The entire length of the downslope limit of disturbance is identified.
11	The drawings identify catchment lengths at the down-slope perimeter of disturbance as either long or short slope lengths. Short slopes have catchment lengths less than 75' for slope less than 5%, or lengths less than 50' for slope greater than 5%.
12	The drawings locate all concentrated flow paths entering, crossing or exiting the site. A concentrated flow path is any flowline, swale, or line marked by a reversal of side slopes that has a drainage area greater than 0.5 acres.
13	The drawings show drainage area for upstream sheet flow entering the site.
Form of drawings	
14	Background drawing shows contours in place at the milestone depicted. In general, no other contours are shown.
15	Background drawing shows only the permanent construction that is in place at the milestone depicted. Background drawing shows sufficient property line, R.O.W., baseline, building footprint or other alignment information to establish locations of BMPs.

Design Guidelines for Erosion and Sediment Control

Table 1	
Erosion and Sediment Control Checklist	
16	Lines and patterns used to indicate BMPs are identified in a graphic legend.
17	Erosion controls to be removed at the depicted milestone are identified individually by leader note.
18	All items are shown to scale and in their scale accurate position.
19	All BMPs are located within the property limits or construction easements of the project.
Protection of undisturbed areas	
20	Pre-clearing plans and subsequent plans show access barrier between active work areas and areas to remain undisturbed.
21	Inactive area stabilization plans show access barrier between work zones and seeded areas stabilized by blankets, mulch, or spray applied mulch.
22	Construction fence is used for the access barrier where the undisturbed area is in response to regulation, i.e. stream buffer or native area used as post construction water quality BMP. Otherwise rope line or permanent curb may be used.
Perimeter sediment control	
23	Perimeter sediment control devices are shown on pre-clearing plan and inactive area stabilization plans.
24	The entire down-slope perimeter has a sediment control BMP identified; and the BMPs selected meet the loading limits of <i>Table 4, Load Rates for Sediment Control</i> .
25	There is a detail plan for each sediment basin or sediment trap, and the plan passes the appropriate checklist.
26	There is a grading detail for the pit accompanying each inlet used as perimeter sediment control. The cut slopes do not exceed 2:1; and storage volume of pit is not less than 950 cf/acre.
27	The elevation of the silt fence does not vary by more than 1.0 feet throughout its treatment length, and the ends are returned uphill a minimum of 1.5 feet higher than the treatment length.
28	Other linear sediment control devices are located generally along a contour and the ends are returned uphill.
29	Vegetative buffers have a minimum width of 10 feet. Vegetative buffers may be located in any orientation to the contour. Vegetative buffers are protected by an access barrier – except for linear projects where the width of vegetative buffer is at least as wide as the work zone the access barrier is optional.
Runoff control	
30	To the extent practicable, flows from undisturbed upstream areas are collected and transported around or through the site unmingled with silt laden water. Diverted flow is transported in a continuous erosion resistant conveyance system.

Design Guidelines for Erosion and Sediment Control

Table 1 Erosion and Sediment Control Checklist	
31	To the extent practicable, runoff control devices are shown on pre-clearing plan. Pre-clearing installation may not be practicable in the following conditions: 1. Top slope diversion on embankment fill slopes, 2. Where deep fills will significantly alter the drainage pattern.
32	Where runoff control could not be placed prior to clearing, the first applicable inactive area stabilization plan shows said runoff control devices.
33	To the extent practicable, concentrated flows within the limits of disturbance with drainage area greater than 0.5 acre are collected and transported in a continuous conveyance system.
34	Conveyances for the continuous conveyance system are approved in <i>Table 5, Stable Conveyance Types</i> , and any limiting requirement is met.
35	Outlet protection at the discharge point for the conveyance system is approved in <i>Table 5, Stable Conveyance Types</i> , and any limiting requirement is met.
36	Where check dams are used they are spaced so the elevation of the bottom of the upper check dam is at the same elevation as or lower than the top of the lower check dam. In lieu of requiring profiles for evaluation of spacing, the alternate review standard is that the plan view shall show the change in the channel flowline between adjacent check dams to be 2 feet or less.
37	Water bars are used on linear projects wherever the fall line of the ground is within 45° of the centerline of the trench. Water bar is constructed from earth, compost berm, gravel berm, compost sock or silt fence. Water bars terminate in vegetative buffer and runoff does not re-enter trench zone. Water bars are spaced less than 50 feet apart.
Stabilization of steep slopes. A steep slope is any slope that is both steeper than 15% and has a difference in elevation between toe and top greater than 3 feet.	
38	Steep slope protection is shown on the inactive area stabilization plan.
39	Water is diverted from the top of slope by a diversion dike or by use of adverse grade at the top of slope. Diverted water is transported in a continuous conveyance system and discharged onto a stable area.
40	Cover type is approved for “all slopes” in <i>Table 6, Approved Cover Types</i> .
41	Where the difference in elevation between the toe and top is greater than 10 feet, a slope interrupt is used at intervals not to exceed 10 feet vertical. The slope interrupt for steep slopes may be compost berm, compost sock, or gradient terrace. Silt fence is not used for steep slope interrupt.
42	Sediment control is located near the toe of the slope. Sediment control meets the loading limits of <i>Table 4, Load Rates For Sediment Controls</i> . Where the toe of the slope is not level and linear sediment control devices are used frequent breaks are shown with the downhill end returned up-slope.

Design Guidelines for Erosion and Sediment Control

Table 1	
Erosion and Sediment Control Checklist	
Inactive area stabilization	
43	A separate inactive area stabilization drawing is provided for each milestone in the land disturbance activities and for each change in the contractor areas.
44	Each inactive area stabilization drawing shows the sediment control and runoff control from previous phases to either continue in place, or be relocated, or be removed.
45	Each area to receive topsoil is indicated.
46	Each subarea within the project site is shown as having one of the following cover types: an active work area, an undisturbed area, an identified cover on a restored inactive area, an identified mud free surface in contractor areas, or an erosion control device such as a sediment trap, sediment basin or stable open channel conveyance. Each cover type is shown graphically as a unique pattern and not as outline only.
47	The cover identified for a restored inactive area is approved in <i>Table 6, Approved Cover Types</i> , for the ground slope in that area. If a bonded fiber matrix is used as a cover either the reviewing municipality has adopted a BFM specification or an adequate project specification is provided.
48	Long, mild and moderate slopes (longer than 75 feet and flatter than 15%) are interrupted at intervals not to exceed 75 feet. Slope interrupts for long, mild and moderate slopes are compost berm, gravel berm, compost sock, or silt fence. Slope interrupts shall approximately follow a contour
49	Silt fence or other linear sediment control is shown within the interior of the construction area where the downslope perimeter of seeded areas is adjacent to pavement or open channels.
50	Inlet protection is used within the interior of the construction area where it will not cause hazard to traffic or cause erosion along the downstream bypass route.
51	Inactive area stabilization drawings show access barrier between active work areas and inactive areas restored by seeding. Paving, sod and similar immediately effective covers do not need an access barrier.
Written Construction Sequence	
52	The written construction sequence requires perimeter controls and access controls shown on the pre-clearing plan to be installed prior to other construction activity.
53	Where early work opportunities are identified, the written construction sequence requires they be persecuted in advance of general clearing to the maximum extent allowed by critical path analysis and the special conditions of the project.
54	The written construction sequence requires runoff control devices to be, to the maximum extent practicable, installed prior to general clearing. Pre-clearing installation may not be practicable in the following conditions: 1. top slope diversion on steep embankment slopes created during the grading phase, 2. Where deep fills will alter the drainage pattern.

Design Guidelines for Erosion and Sediment Control

Table 1	
Erosion and Sediment Control Checklist	
55	Where early installation of runoff control devices is not practicable, the written construction sequence requires check dams to be constructed across the drainageway at the end of any shift when the local weather forecast predicts greater than 10% chance of rain prior to the completion of the next planned shift.
56	The written construction sequence requires all diversion channels, grass lined channels, sediment traps and sediment basins to be stabilized within 5 days of installation.
57	The written construction sequence requires steep slope protection to be placed as soon as practicable during the grading operation.
58	Where water bars are used, the written construction sequence requires water bars to be installed concurrent with the trench backfill operation.
59	The written construction sequence identifies the construction milestone applicable to each inactive area stabilization drawing that triggers the placement or adjustment of the ground cover, access barriers, and other erosion and sediment controls shown on the drawing.
60	The written construction sequence requires that infiltration and retention based post construction water quality BMPs will not be installed until the drainage area is stabilized with an allowable cover and all vegetative cover in the catchment area are established.
61	The written sequence requires that all downslope sediment control stay in place until after the drainage area is stabilized and all vegetative cover in the drainage area are established. Or in the case of sediment basins and traps that are converted to permanent stormwater management facilities that the conversion take place after the drainage area is stabilized and all vegetative cover in the drainage area is established. The written sequence requires stabilization of the areas disturbed by the removal or conversion of the downslope sediment controls.
62	The written sequence requires a plan modification if the plan fails to substantially control erosion and offsite sedimentation.
63	Sites over 10 acres shall have limits in the area of ground to be exposed at any one time or shall have a defined maximum time of exposure for each subarea of the site. Maximum exposure limits have been negotiated with the municipality issuing the permit. Maximum exposure limits are included in the written construction sequence.
Final restoration	
64	Topsoil and planting soil placement is shown on the final restoration plan.
65	Limits of disturbance for installation of post construction water quality BMPs are shown on the final restoration plan.
66	Final restoration plans show the removal of contractor areas and temporary access controls and sediment controls to areas where seed has established or that are protected by immediately effective cover such as pavement or landscape beds. Construction sequence for the final restoration plan calls for the retention of access controls and sediment controls for areas where seed has not established 70% cover.

Design Guidelines for Erosion and Sediment Control

Table 1	
Erosion and Sediment Control Checklist	
67	Cover for area affected by the end of construction removal of temporary BMPs is shown on the final restoration drawing.
Good housekeeping and other measures	
68	A rock construction access is shown on all phases prior to placement of base pavement on all paved surfaces on the site.
69	A concrete washout facility is shown on all phases with concrete deliveries to site.
70	Soil stockpiles are located within 50' of a hillcrest or has an up-slope diversion dike. Stockpiles are located at least 50' away from a drainage way. Stockpiles have sediment control located within 25' of their down-slope toe. Cover for stockpile is approved for steep slopes, and notes require cover to be installed within 14 days of completion of stockpile.
71	A topsoil stockpile is located on the pre-clearing plan, or final restoration plan calls for adequate depths of imported planting soil in all planting areas.

Design Guidelines for Erosion and Sediment Control

Table 2 Checklist for Sediment Basin Detail	
1	A separate custom detail is provided for each sediment basin.
2	The sediment basin is not located in a stream buffer.
3	Existing and construction phase contours are shown. Total volume to the top of riser is not less than 3600 cf/acre of drainage area. Total volume includes sediment storage and transient storage.
4	The extent of ponding at the elevation of the top of riser is shown. The minimum surface area, with water surface at the top of the riser, is 1000 sf/acre, or the flow length is twice the average width.
5	The embankment height does not exceed 15.0 feet, unless designed by a qualified geotechnical professional. The embankment slopes do not exceed 2.5:1. Top width is at least 8 feet. The cover on the embankment is approved for steep slopes. See <i>Table 5, Approved Cover Types</i> .
6	Riser information includes the riser and drain pipe location and diameters, elevation of lowest row of holes, number and size of holes per row, row spacing and top of riser elevation.
7	Dewatering provisions meet one of the following: A. With a permanent pool of 30 to 50% of the design volume, the area of dewatering holes is 0.15 to 0.20 sq-in/row/acre of drainage area. Rows of dewatering holes are separated by 6 inches, vertical. B. With a permanent pool less than 30% of the design volume, the area of dewatering holes is 0.10 to 0.15 sq-in/row/acre of drainage area. Rows of dewatering holes are separated by 6 inch, vertical. (because the smaller permanent pool will have more dewatering rows the area per row will be smaller) A manufactured skimmer is used and a dewatering rate is identified that will drain the basin in 24 to 48 hours.
8	The extent of ponding at the elevation of 4% design storm routed through the overflow spillway is shown at roads, structures and utilities. Ponding does not encroach upon any roadway, structure or utility.
9	The route of the overflow channel and the dimensions of the control section of the overflow channel are shown. Control section and exit channel are located outside of the embankment, and are shown to be seeded and mulched or lined.
10	The overflow channel has a control section that is level in the direction of flow for a distance of 20 feet. The control section width meets the requirements of <i>Section 9 Sediment Basin</i> .
10	Spot elevations shown include: the flowline of the control section, the water surface elevations of the 50% and 4% design storms, the minimum embankment crest elevation “as constructed” and after settlement, and the elevation of the downstream toe of embankment. The settlement allowance for the “as constructed” elevation is 5% of the fill depth.

Design Guidelines for Erosion and Sediment Control

11	Water surface elevations comply with the limits of <i>Section 9, Figure 1: Relationships between sediment basin design elevations.</i>
12	Outlet protection is provided where the drain pipe and the overflow channel rejoin the watercourse.
13	Location and elevation of the sediment cleanout marker is shown. In Kansas the cleanout level can be no more than 20% of the total storage volume. In Missouri the cleanout level can be no more than 50% of the total storage volume. The permanent pool, if used, does not exceed the cleanout level.

Design Guidelines for Erosion and Sediment Control

Table 3 Checklist for Sediment Trap Detail	
1	A separate, custom detail is provided for each sediment trap.
2	Existing and proposed contours are shown. The storage volume and extent of ponding at overflow elevation are shown. Ponding depth is less than 7 feet, and the storage volume is greater than 1800 cf/acre of drainage area.
3	The embankment slopes do not exceed 2.5:1, and the embankment height is less than 15 feet. Stabilization of embankment is appropriate for steep slopes.
4	The minimum embankment crest elevations “as constructed” and after settlement are shown. The settlement allowance for the “as constructed” elevation is 5% of the fill depth.
5	Cover for the downstream face of the embankment approved for steep slopes, see <i>Table 6, Approved Cover Types</i> .
6	The location of the rock outlet section of the embankment is shown. An overflow channel is not required for sediment traps with drainage area less than 5 acres.
7	Location and elevation of the sediment cleanout marker is shown. In Kansas the cleanout level can be no more than 20% of the total storage volume. In Missouri the cleanout level can be no more than 50% of the total storage volume.

Design Guidelines for Erosion and Sediment Control

Table 4		
Load Rates for Sediment Controls		
BMP	Load limits for perimeter sediment control	Interior placement for inactive area stabilization
Sediment Basin*	5 to 50 acre drainage area	N.A.
Sediment Trap*	0 to 5 acre drainage area	N.A.
Silt Fence	<0.25 acre drainage area/100' of treatment length.	At the down-slope edge of seeded inactive areas, and slope interrupt at 75 foot spacing on mild and moderate slopes.
Compost Sock, Compost Berm, Vegetative Buffer and other Linear sediment control devices	Sheet flow only: < 75' catchment length for slopes < 5% < 50' catchment length for slopes > 5%	At the down-slope edge of seeded inactive areas, and slope interrupt at 75 foot spacing on mild and moderate slopes, and slope interrupt at 10-foot vertical spacing on steep slopes.
Inlet Protection, Sump Type with Excavated Pit*	0 to 3 acres drainage area, only where Sediment Trap is infeasible	N.A.
Inlet Protection, Sump Type without Pit	N.A.	Only where ponding will not create traffic hazard
On-Grade Type	N.A.	Only when both continuous stable conveyance and additional treatment are provided downstream.
* A stabilized diversion dike or other runoff conveyance is usually necessary to complete the treatment system.		

Design Guidelines for Erosion and Sediment Control

Table 5	
Stable Conveyance Types	
Conveyance	Limit
Undisturbed stream corridor, with access control	None
Diversion dike, bare ground	Drainage area < 5 Acres, Exposure < 21 Days, Slope < 5%
Diversion dike, seeded & erosion control blanket	Drainage area < 5 Acres
Open channel with check dams	Drainage area < 10 Acres
Open channel with sod lining	Slope less than 5% or the velocity less than 5 fps for the 50% design storm
Open channel with rock or TRM lining	None
Temporary and permanent piped system	None
Water bars	Limited to linear work sites with stable vegetation adjacent to down-slope edge. Spacing less than 50 feet
Slope drain	Drainage area < 2 acres
Outlet protection	
Riprap pad	None
Rock rimmed plunge pool	None
Permanent energy dissipating structure	None
Lateral discharge to a stream	Discharge elevation is at the base flow elevation
Discharge to a sediment basin or sediment trap	Discharge elevation 0 - 1' above maximum sediment accumulation elevation
Discharge point	
Natural stream, vegetated swale or public storm sewer.	Clean water bypass only, outlet protection provided
Sediment basin or sediment trap	Bypass offsite clean water to the extent practicable.

Design Guidelines for Erosion and Sediment Control

Table 6		
Approved Cover Types		
Cover	Mud Free Surface	Allowed for
Seed with erosion control blanket		All slopes
Erosion control blanket without seed		All slopes, winter only
Seed with compost mulch		All slopes
Compost mulch without seed		All slopes, winter only
Sod		All slopes
Final landscape planting and mulch		All slopes
Temporary shoring or permanent retaining wall		All slopes
Seed with bonded fiber matrix		All slopes, with municipal approval
Seed with straw mulch		Mild or moderate slope only
Seed with spray applied mulch		Mild or moderate slope only
Compost mulch without seed		Mild or moderate slope only
Erosion control blanket without seed		Mild or moderate slope only
Crushed stone, gravel or millings	√	Mild slope only
Pavement or pavement base course	√	Mild slope only
Building floor slab	√	Mild slope only
<p>Steep slopes are steeper than 15% and have a change in elevation between top and toe of more than 3 feet.</p> <p>Moderate slopes are flatter than 15% or with less than 3 feet elevation change between toe and top.</p> <p>Mild slopes are flatter than 5%</p>		



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Post-Construction Stormwater Management Program
Plan Review

SOP Identification No: SWMP-02 **BMP No:** 5.B.1

Revision Date: Aug. 8, 2012 **Approved Date:** _____

Primary Department: Urban Planning and Land Use

PURPOSE:

To provide uniform review criteria and documentation procedures for post-construction operation and maintenance of stormwater structural Best Management Practice (BMP) installations.

CONTACT:

Engineering Supervisor, Urban Planning and Land Use (913) 573-5723
Development Support Specialist, Urban Planning and Land Use (913) 573-8664

PROCEDURES:

1. Complete “Project Application” packets, including Construction Plans submitted by Developers and Business Owners (through the Design Engineer company), shall be processed and logged in by the Unified Government’s Development Support Specialist.
2. Submitted Plans shall be distributed to the Engineering Supervisor for assignment to a Project Engineer for review.
3. The submitted Plans shall be reviewed to determine whether or not they are in compliance with the Unified Government’s Land Disturbance & Erosion Control Guidelines and its stormwater design criteria. This review shall be in accordance with the following guidelines: Unified Government’s *Guidelines for Preparing Erosion Control Drawings for Land Development (2009)* and *Storm Drainage Design Criteria for Private Developments*.
4. Written review comments that list and explain required revisions for those items that are not in compliance with the Unified Government’s Design Criteria, Guidelines, and Ordinances shall be sent to the Design Engineer for the Developer or Business Owner.
5. The Design Engineer shall be instructed to revise the Plans as required, to provide a transmittal letter that identifies how each of the Unified Government’s review comment was addressed, and to resubmit the Construction Plans.

6. Repeat Steps 1 thru 5 for Construction Plan resubmittals until all aspects of the Plan set are in compliance with the Unified Government's criteria.
7. Once approved, the Plan Set, as well as Project information, shall be entered into the Unified Government's "Registry of Projects" for Stormwater Treatment BMPs by either Planning Department or Engineering Department personnel. Data to be entered in the "Registry" shall include, but not be limited to, the project location, description, ownership, and other pertinent data for each constructed stormwater BMP.
8. When all aspects are reviewed and found to be in compliance with the criteria, a memorandum documenting that plans are approved is issued to the Development Support Specialist and the project's Design Engineer in a timely manner.

APPLICABLE REFERENCE INFORMATION

1. Unified Government's *Guidelines for Preparing Erosion Control Drawings for Land Development (2009)*.
2. American Public Works Association/Mid-America Regional Council (APWA/MARC) *Manual for Best Management Practices for Stormwater Quality, August 2009 Edition*.
3. Unified Government's *Directions for Storm Drainage Review*
4. Unified Government's *Storm Drainage Design Criteria for Private Developments*.
5. Unified Government's *Post-Construction Stormwater Treatment Ordinance*.



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Vehicle Washing

SOP Identification No: SWMP-03 BMP No: 6.B.1

Revision Date: Aug, 8, 2012 Approved/Date: _____

Primary Department: Street Department

PURPOSE:

To reduce the discharge of pollutants and protect water quality through the use of proper vehicle and equipment washing techniques, proper washing locations, and proper disposal of wash water.

CONTACT:

Fleet Administrator

(913) 573-8375

PROCEDURES:

1. Wash all Unified Government vehicles and service equipment, with the exception of Fire Department vehicles, at the Fleet Maintenance Facility, which is located at 5033 State Avenue.
 - a. Follow posted washing instructions.
 - b. Discharge all wash water to the on-site treatment system (oil/water separator unit), which discharges into the Unified Government's sanitary sewer system.
 - c. Solids and oil collected within the oil/water separator unit shall be periodically extracted by the Water Pollution Control Department and discharged for treatment at the Kaw Point Wastewater Treatment Plant.
 - d. Maintain a monthly record of the number of vehicles washed.
2. Fire Department vehicles are washed at the fire stations to which they are assigned.
 - a. Vehicles are to be washed daily.
 - b. Vehicles should be washed outdoors on the fire station driveway, except during inclement weather. Wash water is discharged to driveway.
 - c. Vehicles should be washed indoors during inclement weather. Wash water is discharged to the sanitary sewer system.
 - d. Vehicles to be washed with biodegradable soap.

3. Minimize water and soap usage when washing and rinsing all vehicles.

APPLICABLE FORMS AND INFORMATION:

1. *Monthly Vehicle Washing Log*
2. *Posted Vehicle Washing Instructions*



POSTED VEHICLE WASHING INSTRUCTIONS

(Posted at entrance to vehicle washing bay)

- ❖ **Wait here for vehicle in bay to exit**
- ❖ **Do not stop in bay**
- ❖ **Do not back up**



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Construction Site Stormwater Runoff
Erosion and Sediment Control Inspection

SOP Identification No. SWMP-04 **BMP No:** 4.A.2

Revision Date: Feb. 12, 2013 **Approved Date:** _____

Primary Department: Public Works Engineering

PURPOSE:

To implement an inspection program for erosion and sediment control activities at all active construction sites that have a Land Disturbance Permit with the UG.

CONTACTS:

Development Support Specialist (913) 573-8664

Stormwater Engineer (913) 573-5724

PROCEDURES:

1. Provide erosion and sediment control inspection training to all of the Unified Government's (UG's) inspectors who are routinely assigned to inspect construction site erosion and sediment control measures.
2. Utilize the UG's Registry of Projects to develop an inspection schedule for active construction sites that have a Land Disturbance permit. The inspection schedule should, as a minimum, include one at construction start-up and then one during the Spring and a second during the Fall. Additional inspections will be scheduled in response to precipitation events that produce one-half inch of rainfall or greater and in response to substantive complaints UG receives regarding specific active construction sites.
3. Inspections will be scheduled with priority given to sites that are actively under construction or that are in the immediate post-grading stage, sites that are upstream of Wyandotte County lake or other area ponds or lakes, and sites with the largest land disturbance areas. The Stormwater Engineer will be responsible for determining the scheduling priority and schedules for all inspections, including post-rain and complaint-related inspections.
4. Furnish a copy of the approved erosion control plans to the inspector assigned to a specific construction site.

5. The inspector will visit each of his/her assigned construction sites and will compare the in-place construction work with the construction documents to determine whether or not the erosion and sediment control measures are in compliance with the approved design. The inspector will also document if the control measures are working and their effectiveness.
6. The inspector will document his/her findings from each site inspection visit on the *Erosion and Sediment Control Inspection Form*.
7. If the erosion and sediment control measures at a site are not in compliance with the approved construction documents, the inspector will notify the Development Support Specialist of the observed violation(s).
8. Upon receipt of a report of noncompliance, the Development Support Specialist will notify the Stormwater Engineer of the noted violation(s).
9. Upon receipt of a report of noncompliance from the Development Support Specialist, the Stormwater Engineer will investigate the report to determine the facts of the situation. If non-compliance is identified, the Stormwater Engineer will contact the construction site supervisor and a verbal resolution will be issued including a date to become compliant.
10. If at the agreed upon date the items are not corrected, the Stormwater Engineer will contact the Development Support Specialist and request that a Notice to Comply (NTC) be issued. Refer to SWMP 05 for enforcement actions.
11. All actions, follow-up procedures, and documentation will be added and maintained in the tracking database as kept by the Stormwater Engineer.

APPLICABLE FORMS AND INFORMATION:

1. Unified Government's *Guidelines for Preparing Erosion Control Drawings for Land Development*.
2. SWMP-01 – *Construction Site Stormwater Runoff Plan Review*
3. *Erosion and Sediment Control Inspection Form*
4. Unified Government's *Land Disturbance Ordinance*
5. SWMP-05 – *Construction Site Stormwater Runoff Control, Erosion Control Enforcement*
6. *Erosion Control Tracking Database*



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Construction Site Stormwater Runoff Control
Erosion Control Enforcement Actions

SOP Identification No. SWMP-05 **BMP No:** 4.A.3

Revision Date: Feb. 12, 2013 **Approved Date:** _____

Primary Department: Public Works Engineering

PURPOSE:

To implement a program for enforcing compliance with the Unified Government’s Erosion and Sediment Control regulations.

CONTACTS:

County Engineer (913) 573-5700

Development Support Specialist (913) 573-8664

Stormwater Engineer (913) 573-5724

PROCEDURES:

1. If non-compliance is identified, the Stormwater Engineer will contact the Development Support Specialist and request that a Notice to Comply (NTC) be issued.
2. The Development Support Specialist will then issue a NTC to the Land Disturbance Permit holder on the non-compliant project. The NTC will identify the erosion and sediment control deficiencies and establish a reasonable time period for correction of the deficiencies or for submittal of a revised plan for review and approval. NTCs for construction sites in the Wyandotte County Lake Watershed will be issued on a priority basis above NTCs in other areas.
3. Upon receipt of notification from the permit holder that action has been taken to correct the problem(s) that prompted issuance of the NTC, the inspector that performed the initial site inspection will return to the project site to verify whether or not the required actions have been completed satisfactorily. Inspections of NTC follow-up in the Wyandotte County Lake Watershed will be scheduled on a priority basis above inspections in other areas.

- a. If the required corrective actions have been completed satisfactorily, the inspector will note this on the *Erosion and Sediment Control Inspection Form* and will report this situation to the permit holder and the Development Support Specialist.
 - b. If the required corrective actions have not been performed satisfactorily, or are not completed within the specified time period, the inspector will note this on the *Erosion and Sediment Control Inspection Form* and will report this situation to both the permit holder and the Development Support Specialist. The Development Support Specialist will then refer the matter to the County Engineer.
4. The County Engineer receives notification from the Development Support Specialist that the erosion and sediment control measures at a construction site are not in compliance with the UG's *Land Disturbance Ordinance*, that the Land Disturbance Permit holder was issued a Notice to Comply (NTC) for the deficiencies, and that corrective measures have not been performed correctly or within the time period identified in the NTC.
 5. The County Engineer will issue a Stop Work Order (SWO) to the Land Disturbance Permit holder. The SWO will direct that all construction activities on the site cease immediately. The SWO will specify the limits affected by the order and the conditions under which work may resume. SWOs will be issued in the Wyandotte County Lake Watershed on a priority basis above SWOs in other areas.
 6. If the deficiencies identified in a SWO are not corrected within seven (7) calendar days, or if the County Engineer determines that the Land Disturbance Permit holder has committed a breach of a permit condition, the County Engineer may issue a Notice of Default (NOD).
 - a. The NOD will identify the required corrective actions and establish a time limit for the corrective actions.
 - b. The NOD will advise the permit holder of the Unified Government's right to correct the deficiency if corrective measures are not performed within the specified correction period.
 - c. The NOD will advise the permit holder of the Unified Government's right to recover the cost of the repairs from the permit holder or, in the absence of a permit, from the property owner.
 - d. The NOD will advise the permit holder of the Unified Government's right to revoke the permit without further notice if the deficiencies are not corrected within the time limit.

7. If the County Engineer determines that the permit holder or property owner has not corrected the conditions listed in a NOD within the established time period, the County Engineer may take any action consistent with the UG code, including one of the following actions:
 - a. Impose a fine.
 - b. Revoke the Building Permit, Land Disturbance Permit, or other permits.
 - c. Authorize the Unified Government, or its agents, to enter the property and correct the violation. The permit holder will reimburse the Unified Government for all costs incurred in correcting the deficiency.

If, in the event that a fine is issued or costs are incurred by the Unified Government in correcting the deficiency and the amount due is not paid, the County Engineer will certify this amount to the Unified Government Clerk and it will become a lien upon the property.

8. NOD issuance and NOD enforcement for construction sites in the Wyandotte County Lake Watershed will be prioritized over other areas.

APPLICABLE FORMS AND INFORMATION:

1. Unified Government's *Guidelines for Preparing Erosion Control Drawings for Land Development*.
2. SWMP-01 – *Construction Site Stormwater Runoff Plan Review*
3. SWMP-04 – *Construction Site Stormwater Runoff Control, Erosion Control Inspection*



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

**Title: Post-Construction Stormwater Management Program
BMP Inspection**

SOP Identification No. SWMP-06 BMP No: 5.B.2

Revision Date: Feb. 12, 2013 Approved Date: _____

Primary Department: Public Works Engineering

PURPOSE:

To implement a post-construction inspection program for stormwater Best Management Practice (BMP) installations for both public and private applications.

CONTACTS:

County Engineer (913) 573-5700

Director, Water Pollution Control Department (913) 573-1301

Stormwater Engineer (913) 573-5724

PROCEDURES:

1. Provide stormwater BMP inspection training to all of the Unified Government's (UG's) construction site inspectors who routinely perform such inspections.
2. Utilize the information recorded in the UG's Registry of Projects to track when Owner-furnished inspection reports for privately-owned stormwater BMP installations are to be submitted to the UG. These inspection reports must be submitted a minimum of once every two (2) years.
3. In the event that the Owner-furnished inspection reports are not submitted in accordance with the approved schedule or reporting requirements, refer the matter to the County Engineer (as delegated by the Director of the Water Pollution Control Department) for the implementation of enforcement actions as stipulated in SWMP-07.
4. Establish a schedule for on-site inspections by UG personnel of all BMPs included within the Registry of Projects to verify compliance with the approved Stormwater Management Plan for each development site. Each site will be inspected a minimum of once per year, with priority given to sites in the Wyandotte County Lake Watershed.

5. Assign inspection personnel to visit all developments sites with constructed BMPs as documented by the Registry of Projects.
6. Furnish a copy of the approved construction documents (plans and specifications) to the inspector assigned to a specific development site.
7. The inspector will visit each of his/her assigned sites and will compare the in-place construction work with the construction documents to determine whether or not the stormwater BMP facilities are in compliance with the approved design.
8. The inspector will document his/her findings from each site inspection visit on the *Stormwater BMP Inspection Form*.
9. If a site is found to be in noncompliance with the approved Stormwater Management Plan, the inspector will notify the Stormwater Engineer of the observed violation(s).
10. Upon receipt of a report of noncompliance, the Stormwater Engineer will investigate the report to determine the facts of the situation. If non-compliance is identified, the Stormwater Engineer will forward this report to the County Engineer for the implementation of enforcement actions consistent with SWMP-07.

APPLICABLE FORMS AND INFORMATION:

1. SWMP-02 – *Post-Construction Stormwater Management Program Plan Review*
2. American Public Works Association/Mid-America Regional Council (APWA/MARC) “*Manual for Best Management Practices for Stormwater Quality, August 2009 Edition.*”
3. Unified Government’s *Post-Construction Stormwater Treatment Ordinance*
4. *Stormwater BMP Inspection Form*
5. SWMP-07- *Post-Construction Stormwater Management Program Enforcement*



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Post-Construction Stormwater Management Program Enforcement Procedure

SOP Identification No. SWMP-07 BMP No: 5.B.3

Revision Date: Feb. 12, 2013 Approved Date: _____

Primary Department: Public Works Engineering

PURPOSE:

To implement a system for the notification of violations, performance of corrective measures, and imposition of penalties associated with noncompliance with the Unified Government's (UG's) *Post-Construction Stormwater Treatment Ordinance*.

CONTACT:

County Engineer	(913) 573-5700
Director, Water Pollution Control Department	(913) 573-1301
Stormwater Engineer	(913) 573-5724

PROCEDURES:

1. The County Engineer (delegated by the Director of the Water Pollution Control Department) receives notification from the Stormwater Engineer that the owner of a stormwater treatment facility has not correctly filed the BMP inspection reports required by the UG's *Post-Construction Stormwater Treatment Ordinance*;
or
2. The County Engineer (delegated by the Director of the Water Pollution Control Department) receives notification from the Stormwater Engineer that the stormwater treatment facility at a development site is not in compliance with the UG's *Post-Construction Stormwater Treatment Ordinance*.
3. The County Engineer, may issue a Notice of Violation (NOV) to the development owner as follows:

- a. NOV will be in writing and will include the location and description of the stormwater treatment facility in violation of the *Post-Construction Stormwater Treatment Ordinance*.
 - b. NOV will describe the nature of the violation, identify the required corrective action, and establish a time limit for the corrective action.
 - c. NOV will include a statement advising the stormwater treatment facility owner of the UG's right to file a lien, and will inform the owner of his/her right to appeal.
 - d. Notice may be delivered to the stormwater treatment facility owner in person, or may be sent by certified mail to the address provided in the UG's Registry of Projects.
 - e. The County Engineer will issue a NOV prior to initiating an enforcement response, which may include either prosecution of the violation or abatement and recovery of costs.
4. If the County Engineer determines that the stormwater treatment facility owner has not corrected the conditions listed in a NOV within the established time period, the County Engineer may take any action consistent with the UG Code, including but not limited to the following actions:
- (1) Impose a fine.
 - (2) Initiate appropriate legal proceedings to correct or abate the violation.
 - (3) Authorize the UG, or its agents, to enter the property and correct the violation.
The stormwater treatment facility owner will reimburse the Unified Government for all costs incurred in correcting the deficiency.
- If, in the event that a fine is issued or costs are incurred by the UG in correcting the deficiency and the amount due is not paid, the County Engineer will certify this amount to the Unified Government Clerk and it will become a lien upon the property.
5. NOV issuance and enforcement for post-construction BMPs in the Wyandotte County Lake Watershed will be prioritized over other areas.

APPLICABLE REFERENCE INFORMATION

1. SWMP-06 – *Post-Construction Stormwater Management, BMP Inspection*
2. Unified Government’s *Post-Construction Stormwater Treatment Ordinance*.
3. American Public Works Association/Mid-America Regional Council (APWA/MARC) *Manual for Best Management Practices for Stormwater Quality, August 2009 Edition*.



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Pesticide, Herbicide, and Fertilizer Application

SOP Identification No: SWMP-08 BMP No: 6.A.1

Revision Date: Aug. 8, 2012 Approved Date: _____

Primary Department: Parks and Recreation

PURPOSE:

Provide uniform procedures for the mixing, application, clean-up, and storage of pesticides, herbicides, and fertilizer.

CONTACTS:

Director, Parks and Recreation Department

(913) 573-8304

PROCEDURES:

1. Mixing

- a. Follow all manufacturers' recommendations for mixing, applying, and handling of fertilizers, herbicides, and pesticides.
- b. Mix fertilizers, herbicides, or pesticides inside a protected area with impervious secondary containment (preferably in well ventilated area indoors) so that spills or leaks will not contact soils and/or drains.
- c. Label all spray tank and handheld containers.
- d. Mix only the minimum volume of fertilizers, herbicides, or pesticides that will be needed for the immediate job.

2. Application

- a. Follow all Federal and State regulations governing use, storage, and disposal of fertilizers, herbicides, or pesticides and training of pesticide applicators.
- b. Time the application of fertilizers, herbicides, or pesticides to be consistent with the manufacturers' recommendation whenever possible to achieve best results. (For example, do not apply during a heavy rainfall or if a heavy rainfall is expected, and do not apply immediately before an irrigation cycle.)

- c. If possible, avoid broadcast spraying of pesticides. Choose an appropriate method of distribution such that application does not extend outside the problem area. (Fertilizer may be broadcast sprayed.)
- d. If possible, spot spray pesticides on infested areas whenever possible rather than treating a larger area. Do not use pesticides on a regular (preventive) basis. Apply only when there is an actual pest problem.
- e. Only use State approved chemicals around water features (ponds, lakes, or streams).
- f. If possible, avoid applying fertilizers, herbicides, or pesticides within 25 feet of any surface water or storm drainage structure.
- g. If possible, use granular fertilizers since they result in lower application losses.
- h. Try to avoid applying fertilizers, herbicides, or pesticides in or near any drainage ditch, creek, pond, or seasonal streambed.

3. Clean-Up

- a. Follow manufacturers' recommendations for cleaning-up and handling of fertilizers, herbicides, or pesticides.
- b. Sweep pavements or sidewalks where fertilizers or other solid chemicals have fallen, sweep them back onto grassy areas.
- c. Clean up any spills or leaks of fertilizers, herbicides, or pesticides promptly.
- d. Make sure all containers are clearly labeled.
- e. Dispose of excess, empty, or expired fertilizer, herbicide, or pesticide containers in accordance with instructions on the label.
- f. If possible, use the triple rinsate from empty containers and/or rinsate from sprayer cleaning as dilution for the next batch.
- g. Never pour triple rinsate from empty containers and/or rinsate from sprayer cleaning onto ground or into any drainage system.
- h. Try to use up the entire product on target areas. If not, dispose of excess, expired, or waste fertilizers, herbicides or pesticides according to manufactures' recommendations.

4. Storage

- a. Store fertilizers, herbicides, or pesticides inside a protected area with impervious secondary containment (preferably indoors) so that spills or leaks will not contact soils and/or drains.

- b. Store chemicals and pesticides at the following locations:
UG Department of Parks and Recreation – 5033 State Ave
UG Chemical Sales Building- 3480 West Dr.
- c. All containers shall be clearly and correctly labeled.

Contracts & Contractors:

1. All contracts for fertilizer, herbicide, or pesticide application shall include stormwater pollution prevention language.
2. All contracts will require that contractors implement proper Best Management Practices (BMPs) to prevent stormwater pollution.

Employee Training:

1. Pesticide application shall be done only under the supervision of a “certified pesticide applicator” or qualified supervisor.
2. All employees who handle or apply pesticides or herbicides shall be trained on the most recent Material Safety Data Sheet(s).
3. Train employees on the proper methods for cleaning up spills or leaks of pesticides, herbicides, and fertilizers.

Record Keeping and Documentation:

1. Keep a list of all employees trained in the facility’s Stormwater Pollution Prevention Binder located at the Department of Parks and Recreation, 5033 State Ave.
2. Records of pesticide application activities shall be kept on the “Horticulturist Daily Worksheet” and filed at the Department of Parks and Recreation 5033 State Ave.
3. An inventory of fertilizers, herbicides, and pesticides (including expiration dates) shall be kept at the Department of Parks and Recreation, 5033 State Ave.
4. Copies of MSD sheets for all pesticides, fertilizers, and other hazardous products shall be kept at the Department of Parks and Recreation office, 5033 State Ave, as well as, the chemical storage facilities at 5033 State Ave and 3480 West Dr.

APPLICABLE REFERENCE INFORMATION

1. *Horticulturist Daily Worksheet*

HORTICULTURIST DAILY WORKSHEET

EMPLOYEE:		DATE:	
TRUCK #:	STARTING MILES:	ENDING MILES:	
START TIME:		END TIME:	
ACTIVITY:			
COMMENTS:			
EMPLOYEE:		DATE:	
TRUCK #:	STARTING MILES:	ENDING MILES:	
START TIME:		END TIME:	
ACTIVITY:			
COMMENTS:			
EMPLOYEE:		DATE:	
TRUCK #:	STARTING MILES:	ENDING MILES:	
START TIME:		END TIME:	
ACTIVITY:			
COMMENTS:			



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Street Sweeping

SOP Identification No. SWMP-09 BMP No: 6.C.1

Revision Date: Aug. 8, 2012 Approved Date: _____

Primary Department: Street Department

PURPOSE:

To protect stormwater quality by removing floatables, sediment, metals, debris, and other pollutants from local roadways. This reduces clogging in the storm drain system, as well as the transport of sediments and pollutants into receiving water bodies.

CONTACT:

Street Superintendent

(913) 573-8375

PROCEDURES:

1. Inspect equipment for functionality and cleanliness prior to operation.
2. Perform street sweeping operations in accordance with the *Street Sweeping Schedule* determined by the Street Superintendent or designee. As warranted and practical, perform additional cleanings in response to public complaints and prior to/following special events.
3. Utilize mechanical sweepers for primary and secondary routes, as well as neighborhood streets that have concrete curbs and gutters. Streets that lack curb and gutters will be cleaned with flusher rigs.
4. Debris collected by mechanical sweepers will be loaded into dump trucks and transported to the Unified Government's KDHE approved collection site at 47th Street and Orville Street. The contents of the dump trucks will be offloaded into dumpsters at this location.
5. Provide a record of street sweeping operations using the *Street Sweeping Documentation Form* and compile monthly into the *Street Sweeping Log*.

APPLICABLE FORMS AND INFORMATION:

1. *Street Sweeping Schedule*
2. *Street Sweeping Documentation Form*
3. *Street Sweeping Log*



STREET SWEEPING DOCUMENTATION FORM

Date: _____

Operator(s): _____

Type of Sweeping Equipment (circle one): Mechanical or Flusher

Route No.: _____ Start Time: _____ End Time: _____

Notes (note any deviations from standard route): _____

Truckloads of Sweepings Collected: _____



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Stormwater Inlet Inspection and Cleaning

SOP Identification No: SWMP-10 BMP No: 6.G.1

Revision Date: Aug. 8, 2012 Approved Date: _____

Primary Department: Sewer Maintenance

PURPOSE:

To protect stormwater quality by removing floatables, sediment, metals, debris, and other pollutants from local roadways that collect in stormwater inlets. This reduces clogging in the storm drain system, as well as the transport of sediments and pollutants into receiving water bodies.

CONTACTS:

Superintendent, Sewer Maintenance Department	(913) 573-1362
Sewer Maintenance Department Dispatcher	(913) 573-5535
Environmental Compliance Superintendent	(913) 573-1304
Stormwater Engineer	(913) 573-5724

PROCEDURES:

1. Inspect inlets in the combined sewer system and MS4 service area on a regular basis, after significant rainfall events, and based on citizen complaints, with the need for and the frequency of such inspections determined by the Stormwater Engineer. The known problem areas are those which have recurring problems with sediment and trash debris, typically located in the sections of the Unified Government (UG) east of Interstate 635.
2. During dry-weather periods, assign Sewer Maintenance Crew to inspect the inlets shown on the UG's storm sewer quarter-section maps.
3. Inspect each inlet for structural integrity prior to evaluating the need for cleaning. Report any deficiencies on the Inlet (Catch Basin) Report form.
 - a. The inspector will be dispatched to investigate all reported inlet deficiencies.
 - b. If a deficiency can be corrected by the Sewer Maintenance Department construction crew, a work order will be written for inlet repair.

- c. If the damage is so severe that it cannot be corrected by the Sewer Maintenance Department construction crew, the problem will be referred to the Public Works Department for correction.
4. Inspect each inlet for the presence of contaminants.
 - a. If a contaminant (such as raw sewage or oil) is encountered, contact the Sewer Maintenance Department dispatcher and request that a Vactor truck be sent to clean the inlet. Log the inspection on the Inlet (Catch Basin) Report form and proceed to the next inlet.
 - i. If the presence of contaminants in a particular inlet or region becomes a recurring problem, refer the situation to the Environmental Compliance Superintendent for investigation.
5. If no contaminants are encountered, determine whether or not the inlet needs to be cleaned.
 - a. If the inlet does not need to be cleaned, log the inspection on the Inlet (Catch Basin) Report form and proceed to the next inlet.
 - b. If the inlet needs cleaning and can be cleaned with the equipment available on the service truck, proceed with cleaning of the inlet. Log the inspection and cleaning on the Inlet (Catch Basin) Report form and proceed to the next inlet.
 - c. If the inlet cannot be cleaned with the equipment available on the service truck and is not holding back flow, log the inspection on the Inlet (Catch Basin) Report form and proceed to the next inlet. Upon returning to the Sewer Maintenance Building at the end of the day, request that the Sewer Maintenance Department dispatcher write a work order to have a Vactor truck clean the inlet.
 - d. If the inlet cannot be cleaned with the equipment available on the service truck and is holding back flow, call the Sewer Maintenance Department dispatcher and request that a Vactor truck be sent to clean the inlet. Log the inspection on the Inlet (Catch Basin) Report form and proceed to the next inlet.
6. At the end of each work day, or once the Vactor truck storage chamber is full, drive to the Unified Government's collection site at 5830 Inland Dr. and discharge the contents of the Vactor truck storage chamber in the designated area. Material collected by the service truck operator shall be disposed of in a similar manner at 47th & Orville.

7. Load residual material into containers at the dumpsite in preparation for landfill disposal.

APPLICABLE FORMS AND INFORMATION:

1. *Inlet (Catch Basin) Report form*

KCK WPC CATCH BASIN REPORT

Map #						Truck # :
Date						Crew:
Node #	Checked	Cleaned	Vac or Flush	Address	Location	
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
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34						
35						
36						
37						
38						
39						
40						
41						
42						
Total # Checked				Daily Total Checked _____		
Total # Cleaned				Daily Total Cleaned _____		



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Illicit Discharge Detection and Elimination - Outfall Inspection

SOP Identification No: SWMP-11 BMP No: 3.B.1

Revision Date: Feb. 12, 2013 Approved Date: _____

PURPOSE:

To provide a uniform procedure for field activities to locate, inspect, and document storm drainage outfalls and to identify any illicit non-stormwater discharges into the separate stormwater system (located within the UG's MS4 Service Area) found during the outfall inspections.

CONTACT:

Engineering Support Supervisor, Sewer Maint. Div.	Telephone No. (913) 573-1374
Environmental Laboratory Director	Telephone No. (913) 573-1313
Stormwater Engineer	Telephone No. (913) 573-5724
Sewer Maintenance Dispatch	Telephone No. (913) 573-5535

PROCEDURES:

1. Incoming complaint calls are addressed in accordance with the procedures outlined in SOP ID No. CSRRP-01. Based on citizen complaint calls or reported observations from UG personnel, the Sewer Maintenance Supervisor will verify that the suspect illicit discharge through an outfall is located within the MS4 Service Area. If it is located within the MS4 Service Area, an Inspector is assigned to inspect the affected stormwater system outfall which contains the suspected illicit discharge. If the location of the discharge is not in the UG's MS4 Service Area, the Sewer Maintenance Supervisor will contact the responsible entity as listed below who has jurisdiction for the reported location:
 - i. City of Bonner Springs, KS (913) 422-1961
 - ii. City of Edwardsville, KS (913) 441-3707
 - iii. City of Lake Quivira, KS (913) 631-7707
 - iv. UG Nine Minimum Controls Area (913) 573-5724
 - v. Delaware Township N/A (Outside of Urban Area)
2. Inspector shall determine if inspection can be performed based on current weather conditions. If weather conditions do not allow for immediate inspection, inspector will attempt to conduct the inspection as soon as possible.

3. Inspector will confirm that equipment and supplies are loaded in their vehicle. Refer to the Field Equipment List below.
4. Proceed to the outfall location.
5. When the outfall structure is reached and located, enter the outfall number on the CSR Event Report Form. If an unknown outfall is identified, assign a temporary number.
6. Complete the inspection of the discharge while following proper safety procedures.
7. Inspect the outfall for proper function, damage, and dry weather flow. Complete all information requested on the CSR Event Report Form and note any follow-up that is required.
8. If the outfall is damaged or clogged, call the Dispatcher at Sewer Maintenance and request that the Dispatcher generate a work order for repair.
9. If an illicit discharge is observed or suspected, call the Dispatcher at Sewer Maintenance and request that the Dispatcher generate a work order for dry weather sampling. Record the information on the CSR Event Report Form. If possible, the inspector will photograph the outfall or discharge.
10. When returning to the WWTP, the inspector shall submit all completed forms, information and photographs to the Mapping and Reports Department for entry into the UG's tracking system.

FIELD EQUIPMENT LIST:

- Level 1 safety equipment: boots, hard hat, safety glasses
- Cell phone or radio equipment
- Maps and outfall records, as needed
- Camera
- CSR Event Report Forms

APPLICABLE REFERENCE INFORMATION:

1. American Public Works Association/Mid-America Regional Council (APWA/MARC) *Manual for Best Management Practices for Stormwater Quality, August 2009 Edition.*
2. Unified Government's *Directions for Storm Drainage Review.*
3. USEPA, *Illicit Discharge Detection and Elimination: A Guidance Manual.*
4. SWMP-12 – *Illicit Discharge Detection and Elimination – Dry Weather Sampling*
5. Collection System Release Response Plan (CSRRP) SOP ID No. CSRRP-01 – *Call Routing and Shift Information*
6. MS4 Service Area Map

APPLICABLE FORMS:

1. CSR Event Report, Form - 02



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Illicit Discharge Detection and Elimination – Dry Weather Sampling

SOP Identification No: SWMP-12 BMP No: 3.B.2

Revision Date: Feb. 12, 2013 Approved Date: _____

PURPOSE:

To provide a uniform procedure for collecting water samples from suspect illicit discharges during dry weather. Water samples will be collected from stormwater sewer outfalls within the UG’s MS4 Service Area.

CONTACT:

Environmental Laboratory Director	Telephone No. (913) 573-1313
Stormwater Engineer	Telephone No. (913) 573-5724
Sewer Maintenance Dispatch	Telephone No. (913) 573-5535

PROCEDURES:

1. The Environmental Laboratory Director will receive a work order from the Sewer Maintenance Dispatcher requesting dry weather sampling be conducted when a dry weather discharge has been reported and inspected by an inspector and the inspector identifies, observes or suspects an illicit discharge. A laboratory staff member will be assigned to conduct the sampling of the observed or suspected illicit discharge.
2. A laboratory staff member will confirm that the required equipment and supplies are loaded in their vehicle. Gather and load an adequate supply of sample containers and coolers from the Kaw Point laboratory. Refer to the Field Equipment List below.
3. The laboratory staff member will confirm the location of the identified outfall to be sampled prior to leaving the office. Proceed to the reported outfall location.
4. Prepare for sampling while following proper safety procedures, such as safety cone placement and safety vests in traffic areas, goggles, gloves, etc. ***Note: never enter a manhole or other confined space to collect a sample. Use a sampler with an extension arm or other method to collect samples out of reach. Contact Sewer Maintenance Division for further assistance if required.***
5. The laboratory staff member will visually inspect the suspected illicit discharge for the types of pollutants reported by Sewer Maintenance inspector.
 - a. If a discharge is definitely, or is believed to be, dangerous, toxic or hazardous, do not proceed with sampling. Immediately contact the Fire Department for the HazMat crew to respond. Follow the procedures outlined in SOP ID No. CSRRP-06.

- b. If a discharge is suspected to be a septic system leak or related discharge, contact the UG Health Department. The UG Health Department will be responsible for addressing this issue.
 - c. If the results of the on-site total chlorine test indicate the discharge may be a water supply or leak problem, contact the Board of Public Utilities. The Board of Public Utilities will be responsible for addressing this issue.
6. The laboratory staff member will collect grab samples of the reported and inspected discharges. Collect duplicate samples for Quality Assurance/Quality Control (QA/QC) reasons.
7. While at the site, the laboratory staff member will perform the following steps:
 - a. Test the samples for temperature, total chlorine and pH. A list of sampling analyses, parameters and suspected pollutants is listed below.
 - b. Assign each sample a unique sample number, to include the outfall number (or other location identifier), date and time.
 - c. Document with notes on the Dry Weather Chain of Custody and Sample Report Form any observations made in the field and samples collected. If possible, photograph the outfall or discharge.
 - d. Complete sample labels and the Chain of Custody and Sample Report Form.
 - e. Preserve samples as required by the laboratory by keeping samples chilled in a cooler.
8. Laboratory staff member shall deliver samples to the laboratory for analysis the same day that the sampling collection was made. ***Note: The bacteria and surfactants have very specific holding times on the samples. This means the laboratory analysis must start within a specified number of hours from sample collection for the analysis to be accurate. Bacteria have an 8 hour hold time and surfactants have a 48 hour hold time.***
9. Sign the Chain of Custody and Sample Report Form and submit it to the Environmental Laboratory Director.
10. Laboratory staff member will also submit a copy of the completed Chain of Custody and Sample Report Form and all other related information and photographs to the Mapping and Records Department for entry into the UG's tracking system.
11. The laboratory staff will proceed with a laboratory analysis for the various parameters listed below following the procedures outlined in Standard Methods and other accepted laboratory sampling practices. Results of the testing are reported to the Environmental Laboratory Director.
12. Laboratory results are also reported to Sewer Maintenance Division by the Environmental Laboratory Director. If enforcement action or system repairs are required, the Sewer Maintenance Division will contact the Stormwater Engineer or the UG Health Department.
13. The Stormwater Engineer will commence with source investigation, any enforcement actions and source tracking consistent with SWMP-13 and SWMP-14.

SAMPLE TYPES TO BE COLLECTED:

Parameter	Laboratory or Field Analysis	Suspect Pollutant Source
Bacteria, E. Coli	Laboratory	Sewage
Surfactants/detergents	Laboratory	Sewage, wash water, Industrial/commercial wastewater
Metals	Laboratory	Industrial/commercial wastewater
Chlorine	Field kit	Swimming pools, wash water, Industrial/commercial wastewater
Ammonia	Laboratory	Sewage, wash water, Industrial/commercial wastewater
Potassium	Laboratory	Industrial/commercial wastewater
pH	Field and/or laboratory	Industrial, wash water
Temperature	Field	Sewage, Industrial/commercial wastewater

FIELD EQUIPMENT LIST:

- Safety gear: boots, safety glasses, hard hat
- Chemical resistant gloves, disposable
- Sample containers
- Preservatives, if applicable to type of samples collected
- Cooler with ice or ice packs
- Sample labels and chain-of-custody forms
- Field notebook or sampling form
- Camera
- Cell phone or radio
- GPS device

APPLICABLE REFERENCE INFORMATION:

1. USEPA, *Illicit Discharge Detection and Elimination: A Guidance Manual*.
2. SOP ID No. CSRRP-06 – *Potentially Hazardous/Toxic Spills*
3. SWMP-13 - *Illicit Discharge Detection and Elimination – Illicit Discharge Source Investigation and Tracking*
4. SWMP-14 - *Illicit Discharge Detection and Elimination – Illicit Discharge Enforcement*

APPLICABLE FORMS:

1. Dry Weather Chain of Custody and Sample Report Form



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Illicit Discharge Detection and Elimination – Illicit Discharge Source Investigation and Tracking

SOP Identification No: SWMP-13 BMP No: 3.B.3

Revision Date: _____ Approved Date: _____

PURPOSE:

To provide a uniform procedure for the investigation of confirmed illicit discharges into the stormwater sewer system and the tracking of the sources located within the MS4 Service Area.

CONTACT:

Sewer Maintenance Inspector	Telephone No. (913) 573-1378
Environmental Laboratory Director	Telephone No. (913) 573-1313
Stormwater Engineer	Telephone No. (913) 573-5724
Sewer Maintenance Dispatch	Telephone No. (913) 573-5535

PROCEDURES:

1. Investigating, searching for, and locating the source of an illicit discharge may require separate responses by Sewer Maintenance Division and/or the Stormwater Engineer.
 - a. If, during the inspection of the suspect illicit discharge, the Sewer Maintenance Inspector is able to readily locate and observe the exact source of the discharge, the Inspector shall perform the following:
 - i. Record on the CSR Event Report Form the address or nearest intersection of the source and all details that they are able to observe.
 - ii. Take photographs of the source location and any supporting observations.
 - iii. Contact the Sewer Maintenance Dispatch concerning the source and request the Dispatcher to notify the Stormwater Engineer to assist in further investigation and to take the appropriate enforcement actions as outlined in SOP ID No. SWMP-14.
 - iv. Sewer Maintenance Dispatch will generate a work order for dry weather sampling as outlined in SOP ID No. SWMP-12.
 - v. Upon returning to the Sewer Maintenance offices, submit the completed form to the Sewer Maintenance Dispatch.

- b. If the Inspector cannot immediately or readily identify the source of the illicit discharge, dry weather sampling of the discharge is conducted in accordance with SOP ID No. SWMP-12.
 - i. An Investigation Work Order is initiated by the Sewer Maintenance Division if the sampling results received from the Environmental Laboratory Director confirm an illicit discharge. A Sewer Maintenance Crew is assigned to investigate the discharge source.
 - ii. Starting at the discharge or outfall point, a Sewer Maintenance Crew will trace the illicit discharge to its source by visual observing the active discharge running in drainage facilities or by opening manholes along the storm sewer and looking for visual evidence of the contaminant. The flow is to be traced or isolated until the improper connection or discharge source is found. Chemical sampling and field testing may be necessary to assist in tracing the discharge to the source.
 - iii. Sewer Maintenance Crew will record all observations and data collected during the sewer system investigation efforts on the Investigation Work Order Form, and provide the completed paperwork, including photographs, to the Sewer Maintenance Dispatch for entry into the UG's tracking system.
2. The Stormwater Engineer and/or the Sewer Maintenance Inspector will take further investigative steps to gather information on the source, such as property ownership records and supporting documentation on the illicit discharge detection and sampling results. Any enforcement action will be undertaken as outlined in SOP ID No. SWMP-14.
3. If the UG is unable to determine or locate the source of the illicit discharge, after a reasonable and good faith effort of two additional investigations, then the Sewer Maintenance Dispatch will record the source as either "Indeterminate" or "Intermittent" in the UG's tracking system.

APPLICABLE REFERENCE INFORMATION:

1. Unified Government's *Code of Ordinances*
2. USEPA, *Illicit Discharge Detection and Elimination: A Guidance Manual*.
3. SWMP-12 - *Illicit Discharge Detection and Elimination – Illicit Discharge Dry Weather Sampling*
4. SWMP-14 - *Illicit Discharge Detection and Elimination – Illicit Discharge Enforcement*

APPLICABLE FORMS:

1. CSR Event Report, Form - 02
2. Investigation Work Order Form.



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Illicit Discharge Detection and Elimination – Illicit Discharge

Enforcement

SOP Identification No: SWMP-14 BMP No: 3.B.4

Revision Date: _____ Approved Date: _____

PURPOSE:

To provide a uniform procedure for enforcement of the UG Code of Ordinance associated with the elimination of illicit discharges into the stormwater sewer system within the MS4 Service Area.

CONTACT:

WPCD Director	Telephone No. (913) 573-1301
Sewer Maintenance Inspector	Telephone No. (913) 573-1378
Environmental Laboratory Director	Telephone No. (913) 573-1313
Stormwater Engineer	Telephone No. (913) 573-5724
Sewer Maintenance Dispatch	Telephone No. (913) 573-5535
Code Enforcement	Telephone No. (913) 573-8600

PROCEDURES:

1. Upon receiving a determination of the source and/or location causing the illicit discharge, the Sewer Maintenance Inspector will inform the Director of the Water Pollution Control Department (WPCD) of the resulting investigation. If appropriate, given the results of the investigation, the WPCD Director, or his authorized designee, will contact the property owner and mail a Notice of Violation letter describing the violations and corrective action required for compliance. The property owner will be given thirty (30) days, or an acceptable timeframe as part of a schedule of compliance which has been developed, to correct, remove and/or cleanup the illicit connection or discharge.
2. Depending upon the circumstances, property owners may be provided certain options for correcting the violation(s). For example, in the event of economic hardship, the property owner may be referred to appropriate community resources for assistance.
3. After 30 days, the Sewer Maintenance Inspector will re-inspect the property to confirm that the illicit discharge or connection violations have been resolved.
4. If the illicit connection or discharge has not been corrected, the WPCD Director may take action consistent with the UG Code, including but not limited to imposing a fine,

initiating legal proceedings to correct the violation, or authorizing UG personnel to enter the property, correct the violation, and place a lien on the property.

5. Final resolution of the violation will be retained in the Legal Department files and recorded in the UG's tracking system.

APPLICABLE REFERENCE INFORMATION:

1. Unified Government's *Code of Ordinances*
2. SWMP-13 - *Illicit Discharge Detection and Elimination – Illicit Discharge Source Investigation and Tracking*



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Wet Weather Monitoring Program - Wet Weather Monitoring

SOP Identification No: SWMP-15 BMP No: 9.A.1

Revision Date: Feb. 12, 2013 Approved Date: _____

PURPOSE:

To provide a uniform procedure for conducting wet weather monitoring activities at eight outfall locations.

CONTACT:

Environmental Laboratory Director

Telephone No. (913) 573-1313

Stormwater Engineer

Telephone No. (913) 573-5724

PROCEDURES:

1. Laboratory staff members will conduct wet weather monitoring activities at eight wet weather monitoring stations once per quarter per outfall according to the established monitoring schedule, and in accordance with the requirements of the MS4 NPDES permit issued by the Kansas Department of Health and Environment (KDHE).
2. To commence the process to obtain a sample during a wet weather event, laboratory staff members will initiate the monitoring stations by telephone at six of the eight locations. The phone numbers for each of the six monitoring locations are posted in the Environmental laboratory at the Kaw Point Treatment Plant. At the remaining two locations, laboratory staff members will visit each site and manually start each monitoring station. Each monitoring station has been programmed to grab discrete and composite water samples within 15 minutes of the first 1/10 in. of rainfall detected and continue to grab samples throughout the first three hours of runoff flow in the storm sewer. The station will also document the time that the sample was taken and record the amount of total rainfall during the three hour time period.
3. The monitoring stations will collect all the required samples and related information for storm events which last less than or equal to a 3-hour time period. At the end of a wet weather sampling event, laboratory staff members return to each station which had been activated.
4. Laboratory staff members will prepare for sampling activities, following proper safety procedures such as cone placement and safety vests in traffic areas, gloves, etc.
5. Laboratory staff members will retrieve the data collected by the monitoring station by plugging in a portable device into the station and downloading the data on site, or by downloading the data through the phone connection, where applicable.

6. Laboratory staff members will access the monitoring station to collect the grab sample and composite sample portions.
7. While at the site, assign each sample bottle a unique sample number, including the outfall number (or other location identifier), date and time.
8. While at the site, document on the Wet Weather Chain of Custody and Sample Report Form observations made in the field and of the samples collected. Field data may include, but is not limited to: discolored water, odors, chemicals, or solids present, activities in progress, people and vehicles in the vicinity, and weather conditions. If possible, photograph the location.
9. While at the site, complete sample labels and Chain of Custody and Sample Report Form.
10. While at the site, preserve samples as required by the laboratory by keeping samples chilled in a cooler.
11. In the lab, staff members will prepare the necessary bottles for testing of parameters outlined in the MS4 permit.
12. After preparing sample containers for Kaw Point Laboratory testing, a laboratory staff member will send the remaining samples to an outside laboratory for further testing for those parameters which the Kaw Point Laboratory is not certified to analyze.
13. Sign the Chain of Custody and Sample Report Form and submit it to the Environmental Laboratory Director.
14. The sampling results will be submitted annually to the Stormwater Engineer for data analysis (SWMP-16) and for incorporation into the annual report sent to KDHE. Consistent with SWMP-16, if an individual monitoring station results indicate high or abnormal pollutant levels, the sampling information from that specific event will be sent without delay to the Stormwater Engineer for further investigation.

FIELD EQUIPMENT LIST:

- Chemical resistant gloves, disposable
- Sample containers
- Preservatives, if applicable to type of samples collected
- Cooler with ice or ice packs
- Sample labels and chain-of-custody forms
- Field notebook or sampling form
- Camera
- Cell phone or radio
- GPS device

APPLICABLE REFERENCE INFORMATION:

1. Unified Government's *NPDES Stormwater Permit*.

APPLICABLE FORMS:

1. Wet Weather Chain of Custody and Sample Report Form



ENGINEERING DIVISION STANDARD OPERATING PROCEDURE

Title: Wet Weather Monitoring Program- Data Analysis

SOP Identification No: SWMP-16 BMP No: 9.A.2

Revision Date: _____ Approved Date: _____

PURPOSE:

To provide a uniform procedure for analyzing data received from the eight wet weather monitoring stations.

CONTACT:

Environmental Laboratory Director

Telephone No. (913) 573-1313

Stormwater Engineer

Telephone No. (913) 573-5724

PROCEDURES:

1. At the end of the reporting year, the Environmental Laboratory Director will submit to the Stormwater Engineer the flow and rainfall data obtained from the wet weather monitoring stations which were activated pursuant to SOP ID No. SWMP-15. Additional information provided for analysis is the sample testing results from each station.
2. The Stormwater Engineer will analyze the data at the end of the permit year and prepare documentation or analyses results which may show noticeable trends or changes in water quality.
3. The data and trend analyses will be included in the annual report that is submitted to KDHE.
4. Areas where data indicates abnormal conditions or inconsistent/downward trends in water quality will be investigated further.
5. If an individual monitoring station results indicate high or abnormal pollutant levels, the sampling information from that specific event will be sent without delay to the Stormwater Engineer for further investigation.

APPLICABLE REFERENCE INFORMATION:

1. Unified Government's *NPDES Stormwater Permit*.
2. SWMP-15 – *Wet Weather Monitoring Program – Wet Weather Monitoring*

APPENDIX F

Fats, Oil and Grease Control Program Plan

Unified Government of Wyandotte County/Kansas City, Kansas

Fats, Oil & Grease (FOG) Control Program Plan

November 2012

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APPENDICES

- A: Food Service Facility Questionnaire
- B: Grease Generator Annual Report
- C: Licensed Grease Hauler Grease Interceptor Service Inspection Report
- D: Hauled Wastewater General Policy (2013)
- E: Hauled Wastewater Ticket Form
- F: Field Investigation Report Form, Sample Letter and Summary Sheet
- G: Grease Trap/Interceptor Maintenance Log
- H: Employee BMP Training Log
- I: Kitchen BMP Document
- J: Food Service Facility Inventory List
- K: Public Education and Public Outreach Examples

ABBREVIATIONS:

AGRU-Automatic Grease Recovery Unit	GRU- Grease Recovery Units
BMP- Best Management Practices	PA- Program Administrator
BPU- Board of Public Utilities	POTW- Publically Owned Treatment Works
DFU- Draining Fixture Unit	SIC- Standard Industrial Classification
DRC- Design and Review Committee	UPC- Uniform Plumbing Code
EPA- Environmental Protection Agency	WPCD-Water Pollution Control Division
FOG- Fats, Oils & Grease	
FSE- Food Service Establishment	
FSF- Food Service Facility	
GIS- Geographic Information System	
GPM- Gallons Per Minute	
UG- Unified Government of Wyandotte County/Kanas City, Kansas	

Section 1- BACKGROUND

Fats, oil and grease (FOG), primarily generated from restaurants and other food service facilities (FSFs), can be contributors to wastewater collection system blockages and overflows. FSFs include, but are not limited to, food processors, food packagers, restaurants, grocery and convenience stores, bakeries, nursing homes and schools. Residential apartment complexes and mobile food cantinas can also be sources of FOG in wastewater. Though not associated with food generation, preparation or serving, other commercial and or industrial facilities may also contribute oils and greases to the collection system.

The Water Pollution Control Division (WPCD) of the Unified Government of Wyandotte County/Kansas City, Kansas (UG) is responsible for the collection, transport and treatment of domestic and industrial wastewater generated by its rate payers. The UG operates and maintains over 800 miles of gravity sewers that are associated with their combined and separate sanitary sewer systems. In order to adequately protect human health and minimize overflow and backups caused by FOG, the UG has developed this FOG Plan to minimize such occurrences caused by FOG discharges within the wastewater collection system.

Section 2- PURPOSE AND INTENT

The FOG Control Program is the overall program that exists to minimize the occurrence of fats, oil and grease within the UG's collection system. This document is the FOG Control Program Plan (FOG Plan), which describes the plan that will be used to develop, implement and administer the FOG Control Program.

The purpose of this FOG Plan is to provide for the phased development and implementation of the FOG Control Program providing protection for the UG's wastewater collection system, pump stations and treatment plants.

The FOG Plan will formalize and enhance the effectiveness of the UG's current grease control practices. The FOG Plan consists of three consecutive phases, each lasting approximately 12 months that encompass the following program elements:

- Year 1- Establish program framework
- Year 2- Implementation of the program's tasks
- Year 3- Review the FOG Program's effectiveness and make appropriate program modifications

The objectives of the FOG Plan include, but are not limited to:

- 1) The reduction of the introduction of and/or removal of FOG associated with food preparation and other FOG generators that discharge to the collection system;
- 2) Provide effective means of interception and removal of FOG through grease interceptors and Grease Recovery Units (GRUs);
- 3) Identify the various components of the FOG Program and its implementation;

- 4) Inform and disseminate information to FSFs and FOG Generating facilities on Best Management Practices (BMPs) to reduce FOG;
- 5) Educate the public on the impacts of FOG in the collection system and how kitchen practices, food preparation and disposal can alter those impacts.

The program will be applicable to food preparation facilities, commercial or industrial facilities that are connected to the UG's collection system and waste haulers that service any FOG generator within the UG's service area and/or discharge FOG-related wastes at the UG's septage receiving station.

Section 3- DEFINITIONS

Automatic Grease Recovery Unit (AGRU) – An electro-mechanical device designed to separate grease from wastewater within the unit and automatically discharge accumulated grease material to a separate container for disposal. The automatic grease recovery unit shall be certified by and conform to applicable Uniform Plumbing Code (UPC) standards. Examples of automatic grease recovery units, include, but are not limited to, Thermaco "Big Dipper", Zurn "1190" system and Josam GI-2000A.

Best Management Practices (BMPs) - Schedule of activities, prohibitions of practices, maintenance procedures and other management practices to prevent or reduce the introduction of FOG to the collection system.

Black Water- Wastewater containing human waste, from sanitary fixtures such as toilets and urinals.

Board of Public Utilities (BPU) - The quasi-governmental water and electric utility that serves all of the residential, commercial and industrial businesses within Wyandotte County. They generate and distribute the monthly utility billing for water, electric, wastewater and storm water all on one billing statement.

Brown Grease- Fats, oil and grease that are discharged to the grease control equipment originating from kitchen or food prep wastewater.

Common Grease Interceptor- An external device to which grease wastes are directed from more than one food service facility or establishment, such as a food court or shopping center. The device functions to separate and retain grease from the normal sewage flows while allowing the balance of the liquid wastewater to discharge to the collection system by gravity. For common grease interceptors, it is the responsibility of the Responsible Party to ensure compliance for all those FSFs that discharge to a common grease interceptor.

Contact Person- The Contact Person shall mean the individual responsible for overseeing daily operation of the FSF or the FOG generator and who is responsible for overseeing the compliance with the FOG Control Program as established herein.

FOG- Abbreviation for Fats, Oil & Grease typically derived from animal or vegetable origins that may interfere with the operation of the collection system or publicly-owned treatment works (POTW), or become a removal problem at the POTW. FOG shall include all pollutants identified as FOG by an EPA-

approved testing method and also originate from mineral and petroleum-based products such as motor oil and industrial sources.

FOG Control Equipment- Properly and legally installed and operated FOG removal equipment including, but not limited to, indoor and outdoor grease interceptors, grease and solids trap combination units, and/or AGRUs as approved by the UG.

FOG Program Administrator- This individual will be directly responsible for managing, coordinating and overseeing the FOG Control Program for the UG.

FSF or FSE- Food Service Facility or Establishment that uses food preparation processes and includes, but is not limited to those facilities that are registered and licensed by the State of Kansas Department of Agriculture. These facilities include, but are not limited to, restaurants, hotel/motel kitchens, hospitals, school kitchens, bars, factory cafeterias, clubs, delis, kiosks, snack bars, grocery stores, convenience stores, food processing and packaging plants, ice cream shops, food courts, coffee shops, cafeterias, diners and any other facility to produce fats, oil and grease originating from animal or vegetable sources.

Grease Generator- Any facility or business that generates grease from an animal or vegetable origin that may interfere with the operation of the collection system or POTW. This also includes grease that may be generated from mineral and/or petroleum products such as motor oil and industrial sources.

Grease Interceptor- An external device designed for flows in excess of fifty gallons per minute (>50 GPM). The device is installed outside of the building and functions to separate and retain grease from the normal sewage flows while allowing the balance of the liquid wastewater to discharge to the collection system by gravity.

Grease Recovery Unit (GRU) - All active indoor mechanical systems designed to remove fats, oils and grease by physical separation from flowing wastewater. The grease recovery unit shall be certified by and conform to applicable Uniform Plumbing Code (UPC) standards.

Grease Trap- An indoor device designed for smaller quantities of flow, typically designed for flow up to fifty gallons per minute (<50 GPM) installed to separate and retain all fats, oil and grease from wastewater flow while allowing the balance of the liquid wastewater to discharge to the collection system by gravity.

Hauler or Grease Hauler- A company, person or contractor who pumps, cleans and collects the contents of a grease interceptor or trap and transports it to a septage receiving station or disposal facility. A grease hauler may also provide other services related to grease interceptor maintenance for a FSF or FOG generating facility.

Renderable FOG container – Means a closed, leak-proof container for the collection and storage of yellow grease.

Responsible Party- The owner or party that pays the bills for water pollution abatement and is listed on the BPU bill as the party responsible for paying the monthly bill. In the case of a common grease

interceptor, the contact person shall be the person(s) named to be responsible in a signed and legal document for operation and maintenance of a common grease interceptor.

Total flow-through rating- The total flow-through rating shall be calculated as the total draining fixture unit (DFU) sum for all fixtures draining to the interceptor equal to the flow in gallons per minute (1 DFU =1 GPM).

Yellow Grease- Fats, oils and grease that have not been in contact or contaminated from other sources (water, wastewater, solid waste, etc.) and can be recycled.

Section 4- FOG PLAN FRAMEWORK

4.1- General FOG Plan Requirements

To assist the UG in cataloging FOG generators, the UG will distribute the FOG Program letter and FOG Questionnaire (Appendix A) to the entire current State of Kansas Department of Agriculture list of FSFs and potential FOG generators identified through the UG's Pretreatment Program. The letter will inform potential FOG generators of the new FOG Program and its basic requirements. Additional information provided will include the BMP pamphlet, reporting forms, employee training logs and FOG educational brochures. The FOG Questionnaire will require information regarding the FOG generator and whether a grease interceptor is used.

Grease wastes pumped or discharged from any grease generator may be subject to inspection, sampling and analysis to determine compliance with all applicable provisions of this FOG Program and rules and regulations of the UG. The WPCD Director or their designee shall perform or supervise such inspection, sampling and analysis at any time during the servicing of any grease trap or interceptor.

All facilities requiring FOG control equipment shall designate a Contact Person or persons and shall inform the WPCD of said designation. The facility is responsible for informing the WPCD if the designated Contact Person is changed.

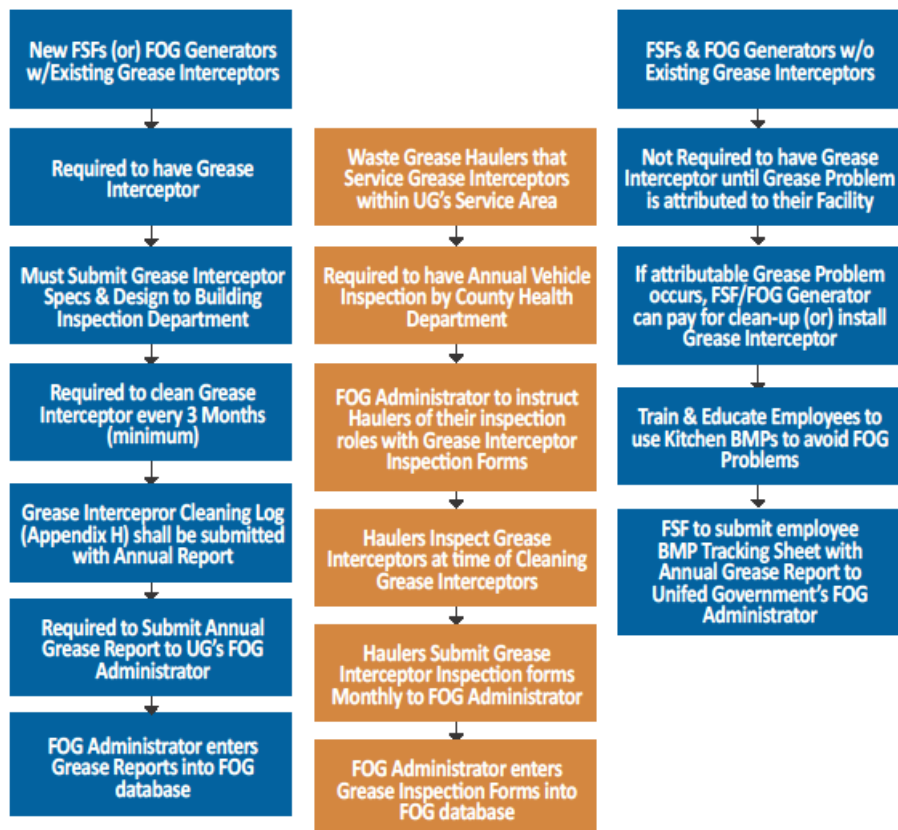
Sanitary facilities and other similar fixtures containing domestic waste shall not discharge to the grease interceptor unless determined necessary by the WPCD. The general FOG Plan requirements are shown in the flow diagram located on the following page.

4.2- New Facilities or Facilities with Existing FOG Control Devices

FOG control equipment shall be provided for facilities as required by the UPC, as adopted by the UG. All new FSFs or FOG generating commercial or industrial facilities will be required to install a FOG interceptor, subject to the following exceptions and exclusions described herein. All wastewater and/or waste containing FOG from a FSF or other commercial or industrial facility shall be directed to and through an approved FOG control device.

Unified Government of Wyandotte County / Kansas City, Kansas

FOG Control Plan General FOG Plan Requirements



All new facilities requiring grease interceptors shall submit the design and specifications for review as part of the UG’s building and code enforcement process. The size and capacity of the FOG control equipment shall be as required by the UPC and UG’s Building Inspection Department. Additional flow-through capacity beyond what is required by the UPC may be required by the Building Inspection Department.

A variance from installing the standard size unit may be requested by the FSF or FOG generating facility. In locations where a variance from the standard unit is approved by the UG, the FOG control equipment

and all associated plumbing shall be installed in accordance with the UPC and grease interceptors shall be sized on a total flow-through rating.

4.3- Identification of Existing FOG Control Devices

Existing grease interceptor locations and information will be gathered through the State of Kansas regulated FSFs, the FOG Questionnaire, previous waste hauling tickets, the grease interceptor inspection forms and other sources. The locations of the new grease interceptors will be identified through the Design and Review Committee (DRC) and building inspections conducted by the UG Building Inspection Department. As a member of the DRC, the WPCD will obtain the following information for the facility:

- Name of the facility,
- Address,
- Phone number,
- Contact person,
- Type of business/facility,
- Size and type of FOG control device

4.4- Existing Facilities without FOG Control Devices

Existing FSFs or other existing FOG generating facilities without FOG control devices shall be granted a conditional waiver, allowing operation without a grease interceptor. This conditional waiver shall remain in force until either the FSF leaves that location/facility or a grease problem arises that can be attributed to the facility. The waiver may be allowed to continue at the discretion of the WPCD Director depending on the type and size of facility that will replace it.

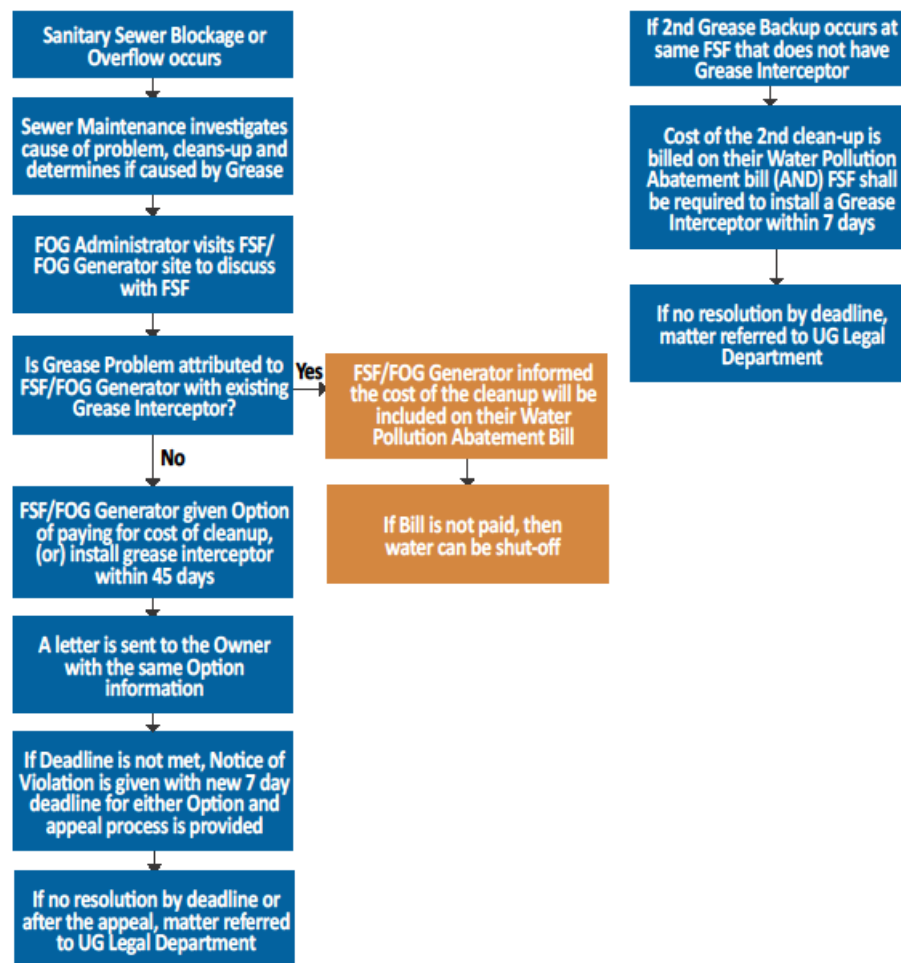
If a grease problem can be attributed to a particular FSF that has an existing grease interceptor, then the cost of the clean-up will be assessed to that facility. The FSF or FOG generator will be notified in writing of the cost of the clean-up, and that it will be assigned to their monthly BPU sewer and water bill.

If a grease problem is attributed to a particular FSF or FOG generator that does not have a grease interceptor, then the cost of the clean-up will be assessed to that facility and/or the FSF may be required to install a grease interceptor. If required to install a grease interceptor, the FSF or FOG generator will be notified in writing and allowed 45 days to complete the installation.

The flow diagram on the following page illustrates the steps of identifying a FOG-related problem and its resolution.

Unified Government of Wyandotte County / Kansas City, Kansas

FOG Control Plan FOG Related Problem and Resolution



Following a FOG incident and ensuing investigation by the UG, where the FSF is required to install a grease interceptor and the FSF is unable to install a grease interceptor due to physical limitations or other circumstances, the FSF may request a variance. In reviewing the variance request, if the WPCD determines the facility cannot install a grease interceptor due to physical limitations or other circumstances, the facility shall install an indoor grease recovery unit(s) capable of maintaining compliance with the FOG Plan.

A variance does not release any generator from compliance with other requirements of this FOG Plan and a variance may be revoked by the UG if it is determined the facility does not maintain compliance

with any conditions of the variance or other requirements of the FOG Program. Should the FOG control equipment other than the standard unit be determined insufficient, or unable to maintain compliance with this program, then new FOG control equipment shall be installed at no less than the standard size unit.

All costs and related expenses associated with the installation and connection of the grease interceptor shall be borne by the FSF or commercial/industrial facility. Property operation, maintenance and repair shall be accomplished solely at the user's expense.

4.5- Roles and Responsibilities

New FOG Generating Facilities or FSFs

The UPC, adopted by the UG, requires grease interceptors to be installed for all new FSFs or FSEs. These include a wide range of "food service" businesses, besides the categories that are inspected and regulated by the State of Kansas Department of Agriculture. The FSF categories regulated by the State of Kansas include restaurants, food processing facilities, grocery and convenience stores, lodging and schools. Other types of FSFs are not limited to, but may include food packagers, food manufacturers, mall food courts, bakeries, dairies, hospitals, nursing homes and churches.

There are also other commercial and industrial FOG generating facilities listed by the WPCD's pretreatment program and their Standard Industrial Classifications (SIC) codes. All new FSF or FOG generating commercial or industrial facilities will continue to be required to install a grease interceptor.

Existing FOG Generating Facilities or FSFs WITH GREASE INTERCEPTORS/TRAPS

These facilities should continue to properly operate, maintain and clean their grease interceptors and traps as needed, or as a minimum, every three (3) months. The UG will locate and identify these facilities through the FOG Questionnaire, waste hauler records, and submission of annual grease reports, grease interceptor service inspection forms and interviews with hauling companies and their drivers.

Existing FOG Generating Facilities or FSFs WITHOUT GREASE INTERCEPTORS/TRAPS

Existing FSFs or other commercial or industrial FOG generating facilities without a FOG control device shall be granted a conditional waiver and will NOT be required to have or install a grease interceptor/grease trap or other FOG control device, until a grease problem arises that can be attributed to their facility. These facilities shall still be required to submit an Annual Grease Report consisting of the updated FSF Questionnaire and the employee BMP training log. The cost of the clean-up will be assessed to that facility, and/or a FOG control device (grease interceptor/trap, etc.) shall be installed, at the WPCD's discretion.

Waste Grease Haulers

Any hauler using the septage receiving station on James Street or at the Kaw Point Treatment Plant must submit the following four items to the WPCD before April 30th of each year:

- 1) Clearance from the licensing division for the occupational tax;
- 2) Proof of current bond, (minimum \$ 5,000) supplied with occupational tax application;
- 3) Current vehicular inspection permit from UG Health Department;
- 4) Access code per vehicle issued by WPCD

These four requirements, discharge fees and other requirements for hauling wastewater are listed in the Hauled Wastewater General Policy. The General Policy is updated periodically by the WPCD. The UG-issued grease hauler vehicle inspection permit (Item #3 above) is valid for that calendar year only. The current (2012) vehicle inspection permit fee for a grease hauler is \$ 100.00 per vehicle for the remainder of the calendar year and expires December 31st.

The County Health Department requires an annual inspection of all waste hauling vehicles to verify tank volume and the integrity of hoses and seals. At the time of this inspection, the UG will provide any grease hauler operating in the UG service area annual training regarding inspection of the grease interceptors and reporting obligations.

All waste haulers that service, pump, clean or provide related services to grease interceptors within the UG service area (regardless of whether or not that hauler disposes of grease at the UG's septage facilities) will be required to submit a grease interceptor service inspection report on a form provided by the WPCD. An inspection form shall be completed for each grease interceptor serviced and submitted to the UG's FOG Program Administrator each month.

FOG Program Administrator (PA)

The Program Administrator will have primary responsibility for recording, reviewing, tracking, monitoring and administering all aspects of the FOG Program. This individual will act as the liaison between the WPCD and all other entities that are part of the FOG Program.

Building Inspection Department

The Building Inspection Department will continue to require and review all design and specifications for grease interceptors as required by the UPC. The Building Inspection Department will also continue to inspect new grease interceptors as part of their building inspection of new or renovated facilities within the County.

The WPCD is a member of the DRC. When a FSF is constructed or renovated and requires a FOG control device, the WPCD will receive notification of the new grease interceptor through the DRC. The PA will record such information in the FOG database.

Business License Department

The Business License Department will continue to collect occupational taxes for new and existing FSFs and other FOG generating businesses. The Business License Department will continue to provide clearance and notification to the County Health Department and the WPCD on those waste grease haulers that are in compliance with their occupational tax requirements for purposes of satisfying the Hauled Wastewater General Policy. The occupational tax is required per waste hauling company and not per hauling vehicle.

Sewer Maintenance Division

The Sewer Maintenance Division will continue preventive sewer cleaning and prioritizing areas where grease build-up occurs. They will also continue to respond to any backups and note if they are associated with grease and provide priority cleaning area locations.

The Sewer Maintenance Division will meet with the FOG Program Administrator on a quarterly basis (approximately) to review any grease related overflows or blockages, changes to the FSF list and the current priority grease cleaning locations. More frequent meetings will occur as appropriate.

Water Pollution Control Division

The WPCD will continue to operate and maintain the septage receiving stations, update the Hauled Wastewater General Policy and provide the necessary support to the FOG PA to administrate the FOG Program.

4.6- Reporting and Forms

Examples of the FOG Program forms are summarized below and provided in the attached appendices, as noted for each form.

Appendix A- FSF Questionnaire

This questionnaire will be distributed to all identified FSF and FOG generating facilities during the first year of the program to assist in determining locations and other data for grease generators and existing FOG equipment. In subsequent years, the FSF Questionnaire will be distributed to all newly identified FSF and FOG generating facilities. Response to the questionnaire will also identify the FSF's contact person or persons. The questionnaire will also be a required submittal as part of the annual grease report for FSFs or FOG generators without a grease interceptor.

Appendix B- Grease Generator Annual Report

All FSF and FOG generators shall submit to the FOG PA an annual grease report. Annual grease report forms will be distributed by the UG in the initial information sent out and will be available on the WPCD's website. The annual report shall be submitted on or before January 31st each year.

Each annual grease report shall provide the following information depending on whether the facility has an existing grease trap/interceptor:

1. FSF with Grease Interceptor:

- Record of the dates the grease trap and/or grease interceptor was pumped or cleaned;
- Name and contact information for the grease hauler;
- Quantity of grease hauled;
- Grease generator contact information;
- Copy of Grease Trap/Interceptor Maintenance Log
- If a FSF, submit a copy of the Employee Kitchen BMP Training log

2. FSF without Grease Interceptor:

- Submit updated FSF Questionnaire
- Submit copy of Employee Kitchen BMP Training log

Failure to submit an annual grease report or failure to submit a complete report may result in an enforcement action.

Appendix C- Licensed Grease Hauler Grease Interceptor Service Inspection Report

Waste haulers that service, pump, clean or provide related services to grease interceptors within the UG service area (regardless of whether or not that hauler disposes of grease at the UG's septage facilities) will be required to submit a grease interceptor service inspection report on this form. An inspection record will be made for each grease interceptor serviced and submitted to the UG's FOG PA each month.

A second grease interceptor inspection form is provided to be used by WPCD staff for internal purposes after a grease problem has occurred.

Appendix D- Hauled Wastewater General Policy

This policy is updated periodically and contains information on what types of wastewater are permissible to be discharged at the septage station. It also lists several provisions and requirements for the discharge of septic and grease trap/interceptor wastes as well as for hauled wastewater from UG permitted industries. The document also includes approved discharge rates, billing procedures and enforcement provisions. Lastly, it addresses the requirements for pumping and transport of wastewaters by commercial haulers and pumpers.

Appendix E- Hauled Wastewater Ticket

A hauled wastewater ticket is completed by the hauling company at the time of discharge for haulers that dispose of hauled wastewater at the UG's septage facility. An access code is issued to each permitted hauling truck, which allows access to the septage receiving station. The UG WPCD staff

maintains a database of approved haulers/dischargers and records the quantity of wastewater discharged at the receiving station.

Appendix F- Field Investigation Report Form, Sample Letter and Summary Sheet

If a blockage or overflow should occur and it is determined by Sewer Maintenance Division that it is due to FOG, then the FOG PA or WPCD designee shall investigate. This is a sample copy of the field investigation report form, sample letter and the incident investigation summary sheet that is used to complete this investigation.

A site visit by the PA will be conducted and if the source or sources of the problem are readily identifiable, a detailed inspection of the grease generator will be conducted and the facility's Contact Person will be interviewed.

Appendix G- Grease Trap/Interceptor Maintenance Log

Each FOG generator shall maintain a grease interceptor/trap maintenance log, a copy of which shall be submitted to the FOG PA with each annual grease report. This maintenance log shall include the following:

- Record of the dates the grease trap and/or grease interceptor was pumped or cleaned;
- Name and contact information for the grease hauler;
- Quantity of waste removed;
- Grease generator contact information;
- Disposal location

The grease trap/interceptor maintenance log shall indicate the cleaning dates for at least the previous three years. Failure to maintain a maintenance log will subject the facility to enforcement.

Appendix H- Employee BMP Training Log

Each FSF shall maintain an employee BMP Training log, a copy of which shall be submitted to the FOG PA as part of the annual grease report. This training log shall cover the prior three years and indicate the FSF's name and address location, employee's name, and the training performed during that three-year period.

Appendix I- Kitchen BMP Document

This kitchen BMP document should be provided to all employees as part of their employee BMP training. Each FSF shall provide kitchen BMP training to all employees. New employees should receive kitchen BMP training within 30 days of employment and follow-up training for all employees should occur every six (6) months. This training will provide knowledge and education on BMPs and the impact FOG has on the collection system.

Appendix J- Food Service Facility (FSF) Inventory List

This list contains the current inventory list of the FSFs that are regulated by the State of Kansas, as well as any industrial and commercial FOG generators identified from the WPCD's pretreatment program information and SIC codes. This inventory list will be updated on an ongoing basis by the FOG PA.

Appendix K- Public Education and Public Outreach Examples

These neighborhood flyers and monthly newsletters are examples of public education and public outreach information on FOG and its impact on the sewer system. FOG information will be distributed to various neighborhoods and target audiences. Various FOG and BMPs can be printed in these monthly newsletters, such as the *Development News* that is distributed by the Neighborhood Resource Center and can be printed in both English and Spanish. These types of resources will allow UG to distribute FOG-related information to a wide variety of "grass roots" organizations and community groups.

Section 5- IMPLEMENTATION PLAN

The FOG Plan consists of three consecutive phases each lasting approximately 12 months and will consist of the following tasks. All tasks listed as Task 1 components will be completed in Year 1, and Task 2 components will be completed in Year 2, and likewise for Year 3 tasks. The tasks in Years 2 and 3 may be accelerated where possible.

Phase 1-Year 1

The first year will focus on establishing a framework for the program. It will consist of hiring a FOG PA, identifying and developing a database of the location and type of existing grease interceptors, distributing letters informing FSF and other FOG generating facilities explaining the development and implementation of the UG's FOG Program, distributing FSF Questionnaires, reviewing and revising ordinances to address the program's requirements, developing a database of existing grease interceptors and potential FOG generators and establishing the reporting and record keeping platforms to efficiently administer the program.

Task 1.1 Initial Plan Tasks Implementation

The core of Year 1 activities will be to begin to implement the FOG Plan. It consists of a variety of important tasks, such as, but not limited to, the following:

- Task 1.1.1 Hire FOG PA- UG recently filled this position in the early part of November 2012. This person will be responsible for administrating the UG's FOG Program.
- Task 1.1.2 Update the FSF Inventory data utilizing the following sources: the State of Kansas' Department of Agriculture licensed restaurants, food processors, grocery and convenience stores and schools, interviews with grease haulers, review of hauled wastewater tickets, FOG Questionnaires and other sources.

- Task 1.1.3 Distribute FOG Program letter and FSF Questionnaire to all identified FOG generators to inform them of the UG FOG Program and its requirements.
- Task 1.1.4 Distribute letter and Questionnaire to the waste grease and septage haulers to inform them of the formal UG FOG Program and their roles and responsibilities with respect to performing inspection of grease interceptors they service (within UG service area). This task will also include interviewing the grease hauling companies and/or drivers to assist in determining the location of known existing grease interceptors.
- Task 1.1.5 Coordinate with Johnson County Wastewater, Kansas City, Missouri Water Services Department FOG Program Coordinators and other known local FOG disposal facilities to review any haul tickets that may have been discharged to either of their septage or grease facilities, but were from FSF or FOG generators with grease interceptors located within the UG service area.
- Task 1.1.6 Revise the Hauled Wastewater General Policy to include inspection of the grease traps/interceptors during each servicing and submission of a grease interceptor service inspection reports to the WPCD and other appropriate modifications to the policy.
- Task 1.1.7 The UG recognizes that food courts and concentrated areas of FSFs may share common grease interceptors. To assist in identifying potential common grease interceptors, the UG will correlate BPU water billing classifications for restaurants with the state's FSF list to assist in identifying and locating grease interceptors.
- Task 1.1.8 Using information from the various tasks above and from other sources, the UG will identify the locations of grease interceptors (within the UG service area) and develop a list of existing grease interceptors and associated FOG generators.
- Task 1.1.9 A FOG database will be established to identify the location of existing grease interceptors and associated FOG generators, annual grease generator reports, cleaning and inspection frequency, waste hauler questionnaires, FSF and FOG generator questionnaires, non-compliance and non-compliance resolution.
- Task 1.1.10 Review Sewer Maintenance Division records and discuss with staff regarding known grease problem areas and to develop GIS mapping procedures to track "grease hot spots."
- Task 1.1.11 The Sewer Maintenance Division will continue to provide preventive maintenance sewer cleaning to identify and track grease problem areas and keep those areas on a routine cleaning schedule.

Task 1.2 Inspect and Permit Waste Grease and Septage Haulers

UG Health Department will continue their annual vehicle inspection of waste grease and septage haulers to ensure the haulers have proper waste hauling vehicles and to check the volume of the tank and make sure all seals and hoses are tight and free of cracks or holes. During these annual vehicle inspections, the haulers will be informed and trained on the inspection and record keeping requirements they will be required to perform as part of their servicing of grease interceptors within the UG service area.

Task 1.3 Review and Revise Legal Authority/Ordinance Changes

As required by modifications to the FOG Control Program, certain existing ordinances will need to be revised, reviewed and approved to provide the FOG program with the required legal authority to ensure and enforce its requirements. Review and revision of existing ordinances and initial development modifications will be completed in Year 1 of the FOG Control Program.

Task 1.4 Best Management Practices for FSFs

A key element of the UG's program will be to inform and assist FSFs and other grease generators by providing educational materials regarding best management practices (BMPs) and employee education information. During Year 1, a BMP pamphlet will be developed and provided to all new and existing FSFs to increase awareness of the potential grease problem and encourage development and implementation of grease control BMPs in their place of business.

Task 1.5 Public Education

Similar to the BMPs for the FSFs, public information materials, which may include bill inserts, flyers and other web-based educational tools will be provided to the general public to make them aware of BMPs for their home food preparation and cooking that can assist with reduction in the overall discharge of FOG to the collection system. The UG will include large apartment complexes and other multi-resident complexes to further educate the public regarding the potential grease problems that can be caused by certain food preparation practices.

Phase 2-Year 2

Task 2.1 Compile Initial Task Implementation Data

As the data from the Year 1 activities and tasks are received, the FOG Program Administrator will continue to compile FOG data. The various elements associated with this task include, but are not limited to:

- Task 2.1.1 The FOG Program Administrator will review every quarter, the State of Kansas FSF list of regulated food businesses, the UG business licensing and the UG's list of commercial and industrial FOG generators and update the data of FOG generators. The FOG Program Administrator will distribute BMP pamphlets and other information regarding the UG's FOG Control Program to the new FSFs and FOG generators.

Task 2.1.2 As Year 1 data comes in from the FOG Questionnaires and waste haulers are interviewed, the grease interceptor data will be updated to obtain a more complete and accurate listing of the locations of existing grease interceptors and their respective FOG generators.

Task 2.1.3 The UG will also track non-compliance, notice of violations, enforcement proceedings and their resolution.

Task 2.1.4 The FOG Program Administrator will meet quarterly with Sewer Maintenance Division staff to review and update priority cleaning locations due to grease accumulations and review any FOG generators identified by Sewer Maintenance Division.

Task 2.2 Implement Legal Authority/Ordinance Changes

Following completion of the review and revisions to the various ordinances affected by this program, revised ordinances will be brought before the UG County Commission and voted upon and implemented to ensure the UG has proper legal authority for the FOG program administration and enforcement. Final revision of the ordinance language and presenting it to the Commission for adoption will be completed in Year 2 of the FOG Control Program.

Task 2.3 FSF and Public Education (Best Management Practices)

The UG will continue to distribute BMP Pamphlets to the new FSFs and provide new BMPs to existing FSFs and employee education material regarding practices to avoid the discharge of grease to the collection system. Likewise, website displays and other public information and education materials (which could include bill inserts, pamphlets, etc.) will be provided as necessary on the impact of FOG discharges to the collection system. This information will be made known to Neighborhood Resource Center monthly newsletters for distribution in both English and Spanish.

Task 2.4 Continued Annual Vehicle Inspections of Waste Haulers

Annual vehicle inspection of waste haulers will continue by the County Health Department. During the inspection the UG will provide driver training regarding their grease interceptor inspection, recordkeeping and reporting duties.

Task 2.5 Review and Monitor Annual Grease Reports

Following Year 1 activities, the annual grease reports will be submitted from the all FSF and other grease generator facilities. The annual grease reports will be reviewed for their completeness and adherence to the FOG Program requirements and recorded as part of the FOG data.

Task 2.6 Compliance Monitoring

The UG will continue to track non-compliance, notice of violation, enforcement proceedings and resolutions to any notice of violation in the FOG Program.

Task 2.7 Review and Monitor Monthly Waste Hauler Reports

Similar to the annual grease reports for FOG generators, the waste haulers will be required to submit the grease interceptor inspection reports. These reports will be submitted to the FOG Program Administrator on a monthly basis, following the servicing of the grease interceptors. The reports will be reviewed and monitored to ensure compliance with the FOG program. These monthly reports will be reconciled with the FOG generator's annual grease reports to ensure compliance with the cleaning frequencies required by the program.

Task 2.8 Review Program Procedures

At the end the second year and once the key elements have been in place and reports are being submitted and cleaning priorities have been established, the overall plan and its procedures will be reviewed and revised if necessary to increase the overall efficiency and effectiveness of the FOG program.

Phase 3-Year 3

Task 3.1 Annual Compliance Task Coordination

The FSF list will be updated based on changes from the State's list for restaurants, food processors, grocery and convenience stores, schools and other FSF facilities. In addition, the industrial and commercial grease generating facilities will be updated.

Sewer Maintenance Division will provide updates to grease problems and cleaning priority areas due to grease and these areas will be added to the GIS maps of grease problem areas and to the database.

Annual inspections of the waste grease hauler vehicles will continue.

Task 3.2 FSF and Public Education (Best Management Practices)

The UG will continue to distribute BMP pamphlets to the new FSFs and other newly identified FOG generators. The UG will continue to provide BMP posters and other educational materials such as bill inserts, newsletters and website updates to both the FSFs and public regarding minimization of FOG discharges and their potential impacts to the UGs collection system.

Task 3.3 Review and Monitor Annual Grease Reports

Annual grease reports will continue to be submitted and will be reviewed for their compliance with the FOG Program and recorded as part of the FOG data.

Task 3.4 Review and Monitor Monthly Waste Hauler Reports

Similar to the annual grease reports, the monthly waste hauler reports will be reviewed and monitored to ensure compliance with the FOG Program and correlated with the annual grease reports.

Task 3.5 Compliance Monitoring

The UG will continue to track non-compliance, notice of violation, enforcement proceedings and resolutions to any notice of violation in the FOG database.

Task 3.6 Review Program Procedures

To maintain efficiency and effectiveness, the FOG Plan's procedures will be reviewed and analyzed to identify and implement changes and improvements, if necessary, to enhance the overall FOG Program. This will be completed in conjunction with the evaluation of staffing and program needs and their effectiveness compared to the various performance measures identified.

Task 3.7 Evaluation of Staffing and Program Needs and Performance Measures

In conjunction with the review of the FOG Program's procedures, at the end of the third year the FOG Program's effectiveness will be evaluated in terms of the designated performance measures. The performance measures identified are discussed later in this plan, but preliminarily include, but are not limited to:

- The number and location of FOG generators that were identified that had grease interceptor or grease traps.
- Increase or decrease in the frequency of sewer line cleaning in those targeted, high priority areas in which FSFs operate.
- Percent compliance rate for annual grease generator reports.
- Percent compliance rate for monthly grease interceptor service inspection reports.

At the end of the third year of the FOG Program, an evaluation will be made of these performance measures and if they should be modified. In addition, the evaluation will review the program's procedures, the submission frequency of the grease generator reports and grease interceptor inspection reports and their effectiveness of meeting the goals of the overall program. An analysis of the program's staffing needs and requirements will also be made.

The following provides a tabular illustration of the implementation plan, its phases and the tasks associated with each phase.

UG GREASE CONTROL PROGRAM												
Proposed Phase Implementation Plan Schedule												
Action Items	Phase 1 (YR 1)			Phase 2 (YR 2)			Phase 3 (YR 3)					
Complete Initial Program Tasks												
Hire FOG Coordinator												
Update FSF Inventory from current State List												
Distribute FOG Program Letter and Questionnaire												
Distribute Letter to Waster Haulers												
Coordinate with JCW/KCMO on Haul Tickets												
Revise Hauled Wastewater General Policy												
Match Water Billing Records with FSF Properties												
Identify and Locate Existing Grease Interceptors												
Develop FOG database												
Review Grease Records to Identify "Hot spots"												
Continue Sewer Cleaning and Track Grease Pblms												
Compile Data from Initial Program Tasks												
Review and Update FSF Inventory List												
Update Existing Grease Interceptor Location Data												
Review and Track Compliance Issues												
Meet with Sewer Maintenance on Grease Issues												
Inspect and Permit Waste Haulers												
Review and Revise Legal Authority/Ordinances												
Draft and Adopt Ordinances/Legal Authority												
FSF Education (Best Management Practices)												
Public Education (BMPs)												
Annual Vehicle Inspection of Waste Haulers												
Review and Monitor Annual FSF Cleaning Reports												
Compliance Monitoring												
Review and Monitor Hauler Inspection Reports												
Review Program Procedures												
Annual Compliance Task Coordination												
Evaluate Staffing and Program Needs												
Review Performance Measures												

Section 6- FOG ANNUAL REPORT OUTLINE

A draft outline for reporting annual FOG activities or an annual FOG report is provided below:

Unified Government of Wyandotte County/Kansas City, Kansas

Fats, Oil & Grease (FOG) Annual Report Draft Outline

1. Introduction
 - 1.1 Development of FOG Generator/Existing Grease Interceptor Database
 - 1.1.1 Update of State FSF List
 - 1.1.2 FSF Questionnaire Results
 - 1.1.3 Correlation with Pretreatment and SIC Industries
 - 1.1.4 Grease Hauler Driver Interviews
 - 1.1.5 Hauled Wastewater Ticket Review
 - 1.1.6 Coordination with Sewer Maintenance Priority Grease “Hot Spots”
 - 1.1.7 Match Water Billing Records with FSF Properties
 - 1.2 FOG Generator Annual Reports
 - 1.2.1 Reporting results
 - 1.2.2 Common Grease Interceptor Locations
 - 1.2.3 Compliance Monitoring
 - 1.3 Grease Interceptor Service Inspection Reports
 - 1.3.1 Reporting results
 - 1.3.2 Waste Haulers Vehicle Inspection and Training
 - 1.3.3 Compliance Monitoring
 - 1.4 Legal Authority
 - 1.4.1 Revision to Existing Ordinances
 - 1.5 Best Management Practices
 - 1.5.1 BMP Materials and Schedule
 - 1.6 Public Education
 - 1.6.1 Target Audiences/Newsletters
 - 1.6.2 FOG BMP Materials
 - 1.7 Performance Measures
 - 1.7.1 Review and Identify Desired Performance Measures
 - 1.7.2 Evaluation Metrics
 - 1.8 Review Program
 - 1.8.1 Evaluate Program Tasks and Procedures
 - 1.8.2 Staffing
 - 1.8.3 Review Program Budget and Costs
 - 1.8.4 Compliance
 - 1.8.5 Recommend Program Modifications

APPENDICES

A: Food Service Facility Questionnaire

B: Grease Generator Annual Report

C: Licensed Grease Hauler Grease Interceptor Service Inspection Report

D: Hauled Wastewater General Policy (2013)

E: Hauled Wastewater Ticket Form

F: Field Investigation Report Form, Sample Letter and Summary Sheet

G: Grease Trap/Interceptor Maintenance Log

H: Employee BMP Training Log

I: Kitchen BMP Document

J: Food Service Facility Inventory List

K: Public Education and Public Outreach Examples

Appendix A

Food Service Facility Questionnaire

UNIFIED GOVERNMENT OF WYANDOTTE COUNTY/KANSAS CITY, KANSAS

FOOD SERVICE FACILITY (FSF) QUESTIONNAIRE

Check Applicable Category

- | | |
|-----------------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> New Construction | <input type="checkbox"/> Existing Building |
| <input type="checkbox"/> Change of Ownership <u>Only</u> | <input type="checkbox"/> Change of Name of Business <u>Only</u> |
| <input type="checkbox"/> Change of Menu <u>Only</u> | <input type="checkbox"/> Other _____ |

Business Name: _____

Business Address: _____

Contact Person: _____
Name Title Telephone

Fax Email Address

Local Contact: _____
Name Title Telephone

FACILITY TYPE (Check all applicable)

- | | | | |
|-------------------|----------------------------------------------------------|-----------------------------------|----------------------------------------------------------|
| Restaurant | Yes <input type="checkbox"/> No <input type="checkbox"/> | Bar or Pub with alcohol sales | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Fast Food | Yes <input type="checkbox"/> No <input type="checkbox"/> | Other facility with alcohol sales | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Convenience Store | Yes <input type="checkbox"/> No <input type="checkbox"/> | Sandwich Shop | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Hospital | Yes <input type="checkbox"/> No <input type="checkbox"/> | Supermarket with meat cutting | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| School | Yes <input type="checkbox"/> No <input type="checkbox"/> | Coffee Shop-No food | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Cafeteria | Yes <input type="checkbox"/> No <input type="checkbox"/> | Coffee Shop-With food | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Care Facility | Yes <input type="checkbox"/> No <input type="checkbox"/> | Bakery | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Ice Cream Store | Yes <input type="checkbox"/> No <input type="checkbox"/> | Other _____ | |

BUILDING INFORMATION

- | | | | |
|------------------|----------------------------------------------------------|-------------------|----------------------------------------------------------|
| Free Standing | Yes <input type="checkbox"/> No <input type="checkbox"/> | Strip Center/Mall | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Expansion | Yes <input type="checkbox"/> No <input type="checkbox"/> | New Construction | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Building Remodel | Yes <input type="checkbox"/> No <input type="checkbox"/> | | |

GREASE INTERCEPTOR INFORMATION

Under-the-sink Grease Trap Yes No Size(s) _____ lb. Gpm _____

Grease Interceptor Yes No Volume _____ Gallons No. of Units _____

Maintain a record of plumbing and grease trap/interceptor maintenance Yes No

How often is the grease trap/interceptor(s) currently cleaned? _____

Date of last grease trap/interceptor cleaning & name of company that cleaned the trap: _____

On-site Oil Dumpster Yes No Name of Oil Recycler _____

I certify under penalty of law that this document and all attachments were prepared under my supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowingly providing inaccurate information.

Signature

Date

Name Printed

Title

Appendix B

Grease Generator Annual Report



**WATER POLLUTION CONTROL DIVISION – GREASE TRAP PROGRAM
ANNUAL GREASE REPORT**

Date: _____

The deadline for submission of this Annual Grease Report is January 31 of each year, which covers the previous year. Please forward any questions to the FOG Control Program Administrator @ (913) 573-1300.

1. Facility Name: _____
Street: _____
City: _____ State: _____ Zip: _____
Your e-mail address: _____

2. Designated Facility Contact:
Name: _____
Title: _____
Telephone Number: _____
Additional Contact Name(s): _____ Phone No. _____

3. Grease Hauler Name: _____
Telephone Number: _____

4. Have any repairs been made to the grease interceptor/trap? Yes No

5. Dates of interceptor/trap cleaning _____
Volume of liquids/solids removed _____
(Size of interceptor/trap)

Submission of Grease Interceptor/Trap Maintenance Log Included Yes No

Submission of Employee BMP Training Log Included Yes No

Method of Disposal _____
(i.e., trash receptacle, land application, treatment plant discharge)

Signature

Title

Choose one of the options below

Fax to: Water Pollution Control Division, FOG Program (913) 573-1351

Mail to: Unified Government of Wyandotte County/KCKS, FOG – 50 Market St, Kansas City, KS 66118

Complete E-form at: waterpollutionctrl@wycokck.org

Appendix C

Licensed Grease Hauler Grease Interceptor Service Inspection Report

&

Follow-up Grease Interceptor Inspection Report



**Unified Government of Wyandotte County/Kansas City, KS
Water Pollution Control Division
Licensed Grease Hauler (LGH)
Grease Interceptor Service Inspection Sheet**

Licensed Grease Handler (LGH) Name _____

Facility Name _____

Facility Address _____

Date of Cleaning _____

Please answer each question as it relates to the current condition of the grease interceptor serviced for the facility indicated above.


Interceptor pumped completely? (Y or N)	
Disposal Location (Kaw Point, Johnson County, KCMO, Topeka, etc.)	<input type="checkbox"/> JC <input type="checkbox"/> KCMO <input type="checkbox"/> TOP <input type="checkbox"/> Other _____
Interceptor cleaning frequency (qtrly, mthly, etc.)	<input type="checkbox"/> Qtrly <input type="checkbox"/> Mthly <input type="checkbox"/> Other _____
Size of Interceptor (gals.)	
Location of Interceptor (SW, NE, etc.)	
Interceptor installed correctly? (Y or N)	
Baffles/Tecs etc., intact? (Y or N)	
Sampling section? (Y or N)	
Thickness of Grease cap (inches)	
Number of sections in interceptor	
Number of manholes for access	
Foreign material present? (Y or N)	
Comments	

The above licensed Grease Hauler certifies the Grease Interceptor, for said indicated facility, has been pumped, serviced, and/or cleaned in accordance with the adopted Unified Government code regulating such work.

Signed by Licensed Grease Hauler

Date

This sheet must be submitted to WPC by the end of each month for the month in which services were completed. Either FAX to WPC @ (913) 573-1351 or Mail to: 50 Market Street, Kansas City, KS 66118 (Attn: FOG Administrator) or E-mail to: waterpollutionctrl@wycokck.org

	Unified Government of Wyandotte County/Kansas City, Kansas Water Pollution Control Division - FOG Control Program 50 Market Street, Kansas City, KS 913-573-1300 FOLLOW-UP INTERNAL GREASE INTERCEPTOR INSPECTION REPORT		
Facility Name:		Date:	
Site Address:	City:	Inspector:	
Contact Name:	Phone:	Fax:	
Facility Type:	Code:		
Permit No:	Last Inspected:		
Reason for Inspection: <input type="checkbox"/> Initial <input type="checkbox"/> Routine <input type="checkbox"/> 1-Yr Follow-up <input type="checkbox"/> Complaint			
INSPECTION CHECKLIST			
	Yes	No	V, C, N/A
1. Grease Interceptor installed.			
2. Frequency of interceptor cleaning/pumping every 3 months or less.			
3. Grease interceptor has been cleaned & pumped within 90 days of last servicing.			
4. Accumulated grease & settled solids is less than 25% of interceptor volume.			
5. Accumulated grease depth is 6 inches or less in depth .			
6. Accumulated settled solids thickness is 8 inches or less in depth.			
7. Grease interceptor operating satisfactory over the last 12 months.			
8. Grease interceptor maintained and not in need of repairs.			
9. Grease Interceptor maintenance log readily filled out, current and checked.			
10. Evidence of BMP materials posted/available to workers (i.e. No Grease signs).			
11. FOG control and BMP training provided to new employees.			
12. Food grinders and traps exist and are discharged to interceptor?			
13. Floor drains in process area drain to interceptor.			
14. Facility recycles or properly collects and disposes of waste cooking oil.			
15. Exterior grease & oil storage containers located away from storm drains.			
Legend: V - Violation, C - Compliance, N/A - Not Applicable			
Comments/Observations/Recommendations/Requirements:			
Reviewed By:	Sample Collected? Y/N	Photos Taken? Y/N	
	Outreach/BMP Materials Provided? Y/N		
FOLLOW-UP INSPECTION (Date/Status)	2nd FOLLOW-UP INSPECTION (Date/Status)		
<i>Form No. 2011fog01</i>			

Appendix D

Hauled Wastewater General Policy (2013)

2012 Hauled Wastewater General Policy
Effective January 1, 2013

**Policies for the Water Pollution Control
Septage Receiving Station in
Kansas City, Kansas**

Introduction

The policies listed below are applicable to any wastewaters that enter the sewer and collection system of the Unified Government of Wyandotte County/Kansas City, Kansas, after being transported. The lists of **Types of Wastewaters Accepted** and **Types of Wastewaters Not Accepted** are not intended to be all-inclusive. Wastewaters listed generically as acceptable may be rejected on a case-by-case basis if their characteristics differ from those of the generic wastewaters, other types of wastewater may be added to the lists as necessary, and other types of wastewater may be accepted or rejected on a case-by-case basis as provided in this Policy.

Changes from the previous Policy are highlighted and in BOLD, italics and underlined.

A. General Information

1. No person shall contribute or cause to be contributed, directly or indirectly, any pollutant or wastewater which will interfere with the operation or performance of the municipal sewer system (including treatment facilities). These general prohibitions are located in Section 30-124 of the Code of City Ordinances.
2. **All submissions of data shall be certified and signed as required by Code section 30-32(b)(6).**
3. **Falsification of data or information supplied to Water Pollution Control ("WPC"), or the submission of any intentionally misleading data or information, is a violation of legal requirements. Any such falsification or submission will be the subject of civil or criminal enforcement, and is subject to significant civil and criminal penalties. Any such falsification or submission will also result in the rejection of the affected wastewaters.**
4. The area surrounding the designated discharge location shall be left in a clean condition. If any cleanup is necessary after a discharge, the responsible party will be charged a cleanup fee. This will be a minimum of \$250.00 for the first occurrence. The fee will be increased by any necessary work, expenditures, etc. on the part of WPC. Any additional occurrences within a consecutive 12-month period will result in the doubling of the previous fee (minimum). It may result in the suspension or revocation of permission to discharge.
5. **If the Director or his/her designee determines that a hauled wastewater is prohibited by this General Policy or otherwise by the Unified Government,**

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Effective January 1, 2013

the privilege of the driver, hauling company, generator or other responsible party from additional discharge shall be immediately revoked.

6. Except for septic tank waste, grease trap waste or portable toilet wastes, all hauled wastewaters are subject to the general prohibitions of Section 30-124 of the Code of City Ordinances. ***Wastewaters prohibited thereby shall not be acceptable as hauled wastewaters, irrespective of their inclusion as a generic waste on the list of Types of Wastewaters Accepted. It is the joint responsibility of the wastewater generator and hauler to determine whether any wastewaters or wastewater characteristics are prohibited.*** A copy of the Code is attached.
7. All wastewater must be discharged into the pipe at the receiving station. No discharge will be permitted on the covered pad.
8. There may be times when conditions at the treatment plant necessitate that we close the receiving station or limit the hours of usage for a period of time. If this occurs, we will give as much notice as possible. The preferred method for notification will be email, fax if no email, phone call (if the closure is sufficiently in the future). If the closure is the result of an emergency, notification may or may not be made by phone. The other methods will be attempted first. Be sure Water Pollution Control has your current email, fax and phone numbers for notification.

B. Types of Wastewaters Accepted

1. The types of wastewaters accepted at the station are private septic tank wastes, portable toilet wastes, restaurant grease trap wastes, Hauled Wastewaters from WPC permitted industries, and Special Hauled Wastewaters (see appropriate sections in this Policy).
2. The documentation and certification on the Hauled Wastewater Ticket is all that is required for the discharge of septic tank waste, grease trap waste or portable toilet wastes.
3. If the load contains any wastewater that is not septic waste, grease trap waste, or portable toilet waste, a Special Wastewater Conditional Permit, Industrial Wastewater Discharge Permit, ***or WPC approval of a wastewater manifest*** must be obtained prior to discharge. A copy of the Special Wastewater Conditional Permit, Industrial Wastewater Discharge Permit or a WPC-approved manifest must be left with the each load. Contact the Environmental Control Section at (913) 573-1300 to verify if the manifest will be acceptable. Or you may fax the manifest to (913) 573-1351 with a request for evaluation.

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Effective January 1, 2013

C. Types of Wastewater Not Accepted

The following wastewaters are not acceptable as hauled wastewaters.

1. Wastewater from categorical processes, unless the industry has a WPC Wastewater Discharge Permit covering such discharge. Any applicable categorical limits will apply at the end of the categorical process or the end of the industrial pretreatment system, not at the discharge location.
2. Wastewater from non-categorical industries with a Wastewater Discharge Permit issued by Water Pollution Control (except on an individual basis – see the sections concerning Special Wastewater and Hauled Wastewater from WPC Permitted Industries)
3. PCB-containing wastes or wastewater
4. Any Hazardous wastes or wastewater meeting the definition of hazardous waste under federal or Kansas law
5. Any waste or wastewater prohibited in Section 30-124 of the local Ordinances or wastewaters which do not meet the limitations listed in Section 30-124 of the Ordinance.
6. Any other waste or wastewater specified as prohibited in local, state or federal regulations
7. Any waste or wastewater that may negatively impact the operation of the sewer system, facilities or treatment plants of the Unified Government
8. Any wastewater which has been refused from another municipality or treatment plant without notification from the municipality or treatment plant which includes the reason(s) for refusal.
9. Sludge or sediment from car wash pits (including industrial car/truck wash pits). Decanted wastewater may be accepted on a case-by-case basis.

D. General Requirements for Discharge of Septic / Grease Trap Waste

1. Any hauler using the Septage Receiving Station on James Street or at the treatment plant at Kaw Point must have the following items on file with the Water Pollution Control Division before discharge of waste begins at the septage receiving station:
 - a. Clearance from the Licensing Division for the Occupational Tax - (913) 573-8780 or (913) 573-8690. The Business License office is located at Indian Springs Mall at 4601 State Avenue, Kansas City, KS (near the intersection of I-635 and State Avenue)
 - b. Proof of current bond, minimum of \$5,000 supplied with Occupational Tax Application
 - c. A current permit issued by the Wyandotte County Health Department – James Baker (913) 573-6785 or (913) 573-8855 – WPC suggests you call ahead to verify someone will be available to do the truck inspection

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and possibly make an appointment. The Health Department is located behind City Hall at 619 Ann Avenue, Kansas City, KS

- d. A code issued by Water Pollution Control
 - e. Deadline for receipt of the paperwork is April 30th of each year. If the paperwork is not complete, the code(s) for the company will be deactivated until the paperwork is current.
2. Each code is issued to a particular truck for a particular hauling company. The designation of this truck must match the permit issued by the Health Department. Inappropriate use of a code will result in all loads delivered that month being charged at the largest tank volume for any vehicle for that company.
 3. The hauling company must leave a Hauled Wastewater Ticket, approved manifest or a copy of the Special Wastewater Conditional Permit for each load delivered or a copy of a manifest approved by Water Pollution Control. The information must be complete on the paperwork. This information includes, but is not limited to, the name of the hauling company, the date and approximate time of delivery, tank size, Wyandotte County Permit Number, the name, address, and phone number of the person/company that generated the wastewater, the type and volume of the wastewater, and signature of the driver on the Hauled Wastewater Ticket. Other information may be required as well.
 4. Each hauler will be responsible for all loads that are delivered as a result of the use of the code to open the gate. Each load after the first (until the gate closes) will be charged as Special Wastewater.
 5. No discharge of hauled wastewater will be permitted into the sewer system of the Unified Government of Wyandotte County/Kansas City, Kansas, except at the location(s) designated for this purpose by Water Pollution Control.
 6. If a vehicle is taken out of service and will not be repaired, notify Water Pollution Control and the code will be deactivated. If additional vehicles are to be used, a code must be issued to each vehicle. If you replace one vehicle with another, bring a copy of the Health Department Permit to Water Pollution Control, and we will transfer the code number from the old vehicle to the new one at no charge.
 7. Any time a code has been deactivated, information will be sent to all applicable pretreatment programs

E. Hauled Wastewater from WPC Permitted Industries

1. Water Pollution Control has issued Wastewater Discharge Permits to some industries outside the boundaries of Wyandotte County. Hauling wastewaters from these industries to the receiving station is permitted, as long as the conditions in the Permit are followed. If you have a question concerning this type of wastewater, contact the Water Pollution Control. All the responsibility

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for these wastewaters will rest with the industrial client, unless other arrangements have been made, and the arrangements have been sent to Water Pollution Control.

2. Each year, the company holding a Wastewater Discharge Permit for discharge of hauled wastewater will forward a list of the hauling company or companies to Water Pollution Control. If the hauling company changes during the year or additional companies are added, this information will also be sent to Water Pollution Control. The minimum information for the hauling companies will include: Name of the Company, mailing address, phone number and contact person at the hauling company. This information may be used if problems arise with the hauling company.
3. Each permitted company will submit a monthly summary of the loads and volumes discharged the previous month. Loads that were delivered, but no manifest was left, may be charged at the Special Hauled Wastewater rate.

F. Special Wastewaters

1. Any wastewater that is not septic tank waste, grease trap waste, or a Hauled Waste from a WPC Permitted Industry is considered Special Wastewater. Special Wastewaters must have prior approval for disposal and be issued a Special Conditional Wastewater Permit.
2. Pre-approvals will only be considered under the following conditions:
 - a. Water Pollution Control receives a written request for the discharge.
 - b. The written request must have the following information, at a minimum:
 - i. Responsible party for the Special Wastewater conditions and payment. The party(s) may be the same or different.
 - ii. Location of wastewater generation
 - iii. Type of waste
 - iv. Approximate volume of the wastewater and estimated frequency of discharge
 - v. Any pretreatment, if applicable
 - vi. Any analytical data available, subject to additional testing being required.
 - c. Each Special Wastewater will be evaluated on a case-by-case basis.
 - d. Minimum requirements for selected general classes of Special Wastewaters will be available upon request.
 - e. Except in emergency situations, requests for Special Hauled Wastewaters must be approved at least 7 days before the wastewater is delivered. If a permit must be issued in less than the minimum of 7-day period, the permit fee will be \$375.00 and the minimum rate will be 150% of the regular rate per gallon.

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- f. If the Special Wastewater is the first permit issued to a company, a minimum 50% of the estimated charges will be due before the first load may be delivered.
 - g. If the Special Wastewater is to be billed to a hauling company which has been late in payment within the previous twelve months, a minimum 50% of the estimated charges will be due before the first load may be delivered.
3. After reviewing an application, Water Pollution Control will issue a response. If the wastewater is accepted, conditions will be listed for the discharge. These may include, but are not limited to, notification of the date and time of discharge, where the discharge will be allowed, sampling of the discharge to verify the preliminary data, additional testing before approval to discharge, and other items as may be determined on an individual basis.
 4. Special Wastewaters may only be discharged at the Septage Receiving Station or other location designated on the Special Conditional Permit.
 5. If Special Wastewaters are delivered to the Receiving station, arrangements must be made to have the paperwork reviewed and the load sampled by Lab personnel
 6. If a Special Waste is delivered without proper documentation, the total charges will be increased by 50%. This means a proper – current – copy of the permit must be included. The fees will be assessed to the hauling company instead of the generator.
 7. Arrangements may be made by phone to continue an existing (but expired) permit if there is not sufficient time to prepare a new permit.
 8. All Special Hauled Wastewater Permits expire on December 31 of each year. The responsible party must re-apply for issuance of a new permit by February 15 of the year or the permit will be cancelled.

G. Billing and Enforcement

1. If a Hauled Wastewater Ticket (or manifest) is not left with any load, that load will be billed as Special Wastewater, at the accelerated rate and based on the volume of the largest permitted truck for the company. If it continues to be an issue, permission to discharge will be revoked.
2. The billing for each load delivered will be based on the type(s) of wastewaters in the load. Any mixed load will be billed at the highest appropriate rate (and volume) for any portion of the load. The billing hierarchy will be: Special Waste, Hauled Permitted Industrial Waste, Septic / Grease / Portable toilets.
3. All billing for discharge fees must be paid by the due date indicated on the invoice. Failure to pay the invoice may result in suspension of permission to discharge and may result in the revocation of the permission to use the septage station for discharge. All codes issued to the hauling company will be

***2012 Hauled Wastewater General Policy
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- deactivated. At that time, a \$100.00 per code fee will be assessed before re-activation.
4. Based on the approval effective January 1, 2012, the discharge rates are:
 - a. Septic tank waste - \$0.095 per gallon, based on 75% of truck or tank volume. OR \$0.095 per gallon for actual volume discharged, if appropriate documentation can be provided
 - b. Grease Trap waste - \$0.095 per gallon, based on 75% of truck or tank volume OR \$0.095 per gallon for actual volume discharged, if appropriate documentation can be provided
 - c. Portable Toilet waste - \$0.095 per gallon, based on 75% of truck or tank volume OR \$0.095 per gallon for actual volume discharged, if appropriate documentation can be provided
 - d. Hauled Wastewater from WPC Permitted Industries - \$0.250 per gallon, based on discharged volume + sampling & analytical fees + other fees if applicable
 - e. Special Hauled Wastewater - \$0.350 per gallon, based on discharged or permitted volume + administrative fees + sampling & analytical fees + other fees if applicable
 - f. Each invoice will be due thirty days after the invoice date.
 - g. A one-time late fee of 5% of the unpaid balance will be added to any invoice that is not paid in full by the invoice date. (There is a three-day grace period).
 - h. The minimum billing for any discharge will be based on 100 gallons.
 5. If any check is returned as declined by the bank, a Cashier's Check (or equivalent) in the amount of the check will be required. In addition, a separate Cashier's Check (or equivalent) in the amount of \$30.00 will be required before the code(s) will be re-activated. If there are more than two declined checks in any twelve-month period, the privilege of discharging will be revoked for a minimum of two years. At that time, the company may re-apply for discharge privilege (with conditions to be determined on an individual basis)
 6. Discharge rates, times, conditions, etc are subject to change or adjustment if approved by the Board of Commissioners or designee.
 7. Failure to comply with conditions of the Septage Receiving Station or the designated discharge location for other hauled wastewaters will typically result in the following enforcement actions being taken. The time period for the incidents will be one year (12 months) from the first incident, not a calendar year. **However, nothing herein shall waive the enforcement discretion of the Unified Government, and in an individual case enforcement actions may be either more stringent or less stringent based on the facts of the case.**

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- a. First Incident – A phone call will be made to the hauling company. A follow-up letter to the hauling company will document this conversation.
 - b. Second Incident (within 12 months) – A certified letter will be sent to hauling company with a \$100.00 fine
 - c. Third Incident (within 12 months) – A certified letter will be sent to hauling company indicating the code(s) issued to the company have been deactivated. A fine of \$250.00 will also be indicated. All codes must be returned to Water Pollution Control within seven (7) days of the receipt of the letter. If the codes are not returned within this time frame, a charge of \$100.00 per code will be added to the final billing for the hauling company.
 - d. A formal request for reinstatement may be made after six months have passed with no balance due.
8. If enforcement action is taken, the hauling company will have 30 days to file a written appeal. If the appeal is not filed within this time period, the right to appeal that enforcement action will be forfeited.
 9. Replacement codes will be issued upon written documentation of the loss of the original code. Replacement codes will be charged at the maximum of \$100.00 per code or replacement cost of the code.
 10. If any invoice is more than 30 days past due, all codes issued to the company will be deactivated. A letter will be sent to the company indicating the codes must be returned. If the delinquency is not corrected within 30 days of the notification, the information will be forwarded to the Office of the District Attorney for action.
 11. An annual fee of \$100.00 per code will be assessed on the January billing. If additional codes are added during the year, a code fee of \$100.00 will be added to the next billing.

H. Responsibilities of Hauling Companies

Companies that haul wastewaters to septage station of Water Pollution Control on James Street or at the Kaw Point Treatment Plant have the following responsibilities:

1. Assure a Hauled Wastewater Ticket, Special Conditional Permit and / or manifest is signed by WPC personnel and left for each load delivered. Contact laboratory personnel if sampling is indicated.
2. Assure all conditions listed in the Special Conditional Permit are followed.
3. Discharge wastewater into the standpipe by hose, unless Water Pollution Control has given permission to discharge onto pad at the James Street station
4. Assure the area near the discharge pit at the discharge station is cleaned after use. It must be at least as clean as when you arrive.

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5. Exit from the gated area and wait until the gate has closed to leave the area. This will assure no other vehicle enters the facility while the gate is in motion.
6. If there is a problem, contact Water Pollution Control at (913) 573-1300.

Summary

It is in the best interests of the Unified Government and the hauling community to ensure the receiving facility is clean and functional. These policies have been established to provide a mechanism to allow the station to continue to receive and treat the hauled wastewaters in an environmentally correct and appropriate method. Any suggestions for the improvement of the process of disposal of hauled wastewaters would be appreciated.

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Effective January 1, 2013

Sec. 30-124. Prohibited discharges

No person shall contribute or cause to be contributed, directly or indirectly, any pollutant or wastewater which will interfere with the operation or performance of the municipal sewer system (including treatment facilities). These general prohibitions apply to all such users of the municipal sewer system whether or not the user is subject to national categorical pretreatment standards or any other national, state, or local pretreatment standards or requirements. A user shall not contribute the following substances:

- (1) Any liquids, solids or gases which by reason of their nature and quantity are or may be sufficient, either alone or by interaction with other substances, to cause fire or explosion or be injurious in any other way to the municipal sewer system or to the operation of the sewage treatment works; any petroleum oil, nonbiodegradable oil, or products of mineral oil origin in amounts that will cause interference or pass through; or any pollutant resulting in the presence of toxic gases, vapors or fumes within the sewers or POTW sufficient to cause worker health and safety problems. Any noxious or malodorous liquids, solids, or gases which, singly or by interaction with other wastes, are sufficient to create a public nuisance or hazard to life, or are sufficient to prevent entry into the sewers for maintenance and repair. At no time shall two successive readings on an explosion hazard meter, at the point of discharge into the system (or at any point in the system), be more than five percent nor any single reading over ten percent of the lower explosive limit (LEL) of the meter. Prohibited materials include, but are not limited to, gasoline, fuel oil, kerosene, naphtha, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, sulfides, any other substances which are a fire hazard or a hazard to the system and wastestreams containing substances with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Celsius using test methods specified by EPA.
- (2) Any solids, natural or manmade fibers, insoluble or emulsified oils, fats, or greases, slurries or viscous materials of such character or in such quantity that may cause an obstruction to the flow in the sewer or otherwise interfere with the proper functioning of the sewage treatment works such as, but not limited to, ashes, cinders, sand, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, unground garbage, hides, paunch manure, hair and fleshings, entrails, spent lime, stone or marble dust, grass clippings, spent grains, spent hops, asphalt residues, residues from the refining or processing of fuels or lubricating oils, glass grinding or polishing wastes, and paper dishes, cups, milk containers, etc., either whole or ground by garbage grinders.
- (3) Any waters, waste, material or substances which are corrosive or irritating to human beings or animals, or are toxic or noxious or which contain toxic, poisonous or conventional pollutants that are solids, liquids, or gases in sufficient quantity, either singly or by interaction with other wastes, and cause interference or pass through or otherwise injure or interfere with the sewage treatment process, including by not limited to sludge use and disposal, or which constitute a hazard to humans or animals,

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or which create a public nuisance, or which create any hazard in the receiving waters of treated effluent or the sewage treatment works.

- (4) Health department permitted wastes, except at selected locations as designated by the director.
- (5) Acetylene generation sludge.
- (6) Any waters or wastes containing fats, waxes or total oil and grease as determined by an EPA approved method shall not exceed 250 mg/l. For facilities that manufacture biodegradable and food grade emulsified and dissolved oils, the director may establish mass-based limits. Waters or wastes containing substances that may solidify or become viscous at temperatures between 32 and 150 degrees Fahrenheit are prohibited, except at selected locations as designated by the director.
- (7) Any waters or wastes containing strong acid, iron, pickling wastes, or concentrated plating solutions, whether neutralized or not.
- (8) Any waters or wastes containing phenols or other taste- or odor-producing substances, in such concentrations exceeding limits established by the director as necessary, after treatment of the composite sewage, to meet the requirements of local, state, federal or other public agencies of jurisdiction for such discharge to the receiving waters.
- (9) Any radioactive wastes or isotopes of such half-life or concentration as may exceed limits of radiation ($\mu\text{Ci/ml}$) established by the director in compliance with applicable local, state or federal regulations.
- (10) Any waters or wastes having a pH less than 5.5 standard units (SU) or in excess of 10.5 SU.
- (11) Materials that exert or cause a significant load on the sewage treatment works or a discharge of any pollutant that is sufficient to cause or is likely to cause interference and pass through, such as:
 - a. Concentrations of inert suspended solids (such as, but not limited to, diatomaceous or Fuller's earth, lime slurries, and lime residues) or of dissolved solids (such as, but not limited to, sodium chloride or sodium sulfate).
 - b. BOD, COD, chlorine.
 - c. Volumes of flow or concentration of wastes constituting "slugs" as defined herein.
- (12) Waters or wastes containing substances which are not amenable to treatment or reduction by the sewage treatment processes employed, or are amenable to treatment only to such degree that the sewage treatment works effluent cannot meet the requirements of agencies having jurisdiction over discharge to the receiving waters, or any substance which may cause the sewage treatment works effluent or any other product of the municipal sewer system such as residues, sludges or scums to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case shall a substance discharged to the municipal sewer system cause the sewage treatment works to be in noncompliance with sludge uses or disposal criteria, guidelines, or regulations developed under section 405 of the act (33 USC 1345); any

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criteria, guidelines or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act (42 USC 6901 et seq.), the Clean Air Act (42 USC 7401 et seq.), the Toxic Substances Control Act (15 USC 2601 et seq.), or state criteria applicable to the sludge management method being used.

- (13) Any waste exceeding the following limits:
- a. Arsenic (As): 0.27 mg/l.
 - b. Cadmium (Cd): 4.16 mg/l.
 - c. Chromium (Cr): 4.01 mg/l.
 - d. Copper (Cu): 5.15 mg/l.
 - e. Cyanide (CN): 0.29 mg/l.
 - f. Lead (Pb): 0.81 mg/l.
 - g. Nickel (Ni): 4.10 mg/l.
 - h. Mercury (Hg): 0.02 mg/l.
 - i. Silver (Ag): 1.03 mg/l.
 - j. Zinc (Zn): 5.16 mg/l.
 - k. Total petroleum hydrocarbon: 100 mg/l.
 - l. MBAS:
 1. Daily maximum: 90 mg/l.
 2. Monthly average: 70 mg/l.
 - m. BTEX (total): 16 mg/l.

Equivalent mass limits may be allocated to industrial users for any of the limits set out in this subsection at the director's discretion. In no case shall a wastewater discharge permit limit for discharge to the municipal sewer system be less stringent than the federal or state limit, if it exists. This would apply to categorical industries and may apply to specific industries identified by the unified government or state.

- (14) Any wastes contributed by users of the POTW that, either singly or in conjunction with other significant industrial users, cause the POTW influent to exceed the following limits (lbs./day):
- a. Arsenic: 15.91.
 - b. Cadmium: 162.43.
 - c. Chromium: 156.61.
 - d. Copper: 201.16.
 - e. Cyanide: 11.21.
 - f. Lead: 31.80.
 - g. Nickel: 16.20.
 - h. Mercury: 201.35.
 - i. Silver: 1.66.
 - j. Zinc: 40.08.

- (15) No user using silver in manufacturing or as part of a process operation, including, but not limited to, the development and/or printing of photographic pictures or X-rays, precious metal plating, or any operation where silver is reasonably expected to be found in the facility's wastewater, shall discharge silver bearing wastewater to the

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public sewer without first treating the wastewater to remove the silver or subjecting the wastewater to a silver recovery process. Requirements listed in best management practices (BMPs) that have been approved by the director will be enforceable by the water pollution control division. The use of an approved BMP by an industrial user shall be governed by the policies established by the director. These include but are not limited to the provisions for sampling and inspection by the unified government and sampling and reporting requirements for the facility. It shall be unlawful for an industrial user to discharge a silver-rich solution from a photographic processing facility or otherwise introduce such solution into the municipal sewer system, unless such silver-rich solution is managed by the photographic processing facility in accordance with the Code of Management Practice for Silver Dischargers, as identified in section 30-1, prior to its introduction into the municipal sewer system. The Code of Management Practice for Silver Dischargers is a fully enforceable element in the unified government's industrial pretreatment program and constitutes a local limitation for silver discharged from photographic processing facilities. If a photographic facility does not comply with the requirements in the Code of Management Practice for Silver Dischargers, the numeric limitation for silver (Ag) per subsection (14) of this section will be enforced.



UNIFIED GOVERNMENT OF WYANDOTTE COUNTY AND KANSAS CITY, KANSAS

PUBLIC WORKS DEPARTMENT WATER POLLUTION CONTROL DIVISION ENVIRONMENTAL COMPLIANCE SECTION

50 MARKET STREET
KANSAS CITY, KANSAS 66118

(913) 371-4240
FAX (913) 551-0488

This form is the Special Wastewater Pre-Approval Checklist. It is not an all-encompassing form. Each wastewater stream or type may be treated individually. This form has been developed over time to address the situations that recur frequently. In order to begin the process of pre-approval, please furnish the following information. The information may be sent by mail to the address above, email to sraig@wycokck.org or by fax to the number listed above. Water Pollution Control will contact you if additional information is required. A Special Wastewater Pre-Approval Application is available.

Special Wastewater Pre-Approval Checklist

1. Responsible Party for the Special Wastewater. This is the party who will be responsible to assure all conditions of the Special Conditional Permit (if issued) are followed. It must include a person to contact, name of company, address, phone number and fax number, at a minimum.
2. Responsible Party for the billing. This is the party who will be responsible to assure all fees associated with the discharge are paid. It must include a person to contact, name of company, address, phone number and fax number, at a minimum. It may or may not be the same as the Responsible Party for the Special Wastewater.
3. Location of the generation of the wastewater. This will include the company name, street address, city, state and zip code of the actual wastewater generation location. The name of the on-site contact person is also required.
4. Type of Wastewater. This includes the general type of wastewater (petroleum impacted groundwater, wash water, etc.). This description will include the method of generation of the wastewater, if known. Analytical requirements are based on this information.
5. Approximate volume of wastewater. This may be a calculated volume if that is the easiest method. The volume does not need to be known exactly at the time of application for pre-approval.
6. Any pretreatment that has been done, or will be done before discharging the wastewater or hauling to the designated discharge location.
7. Any analytical data available, subject to additional testing requirements. If the wastewater has previously been characterized, all data must be provided for initial evaluation.
8. All other conditions and requirements included in the current version of the Hauled Wastewater General Policy also apply. This includes, but is not limited to, the types of wastewaters that are not acceptable.
9. Notice that limitation for BTEX is the total of the components of BTEX.
10. Selected Limitations (from the Ordinance or policy of Environmental Section)

No wastewater can be accepted if any of the following limits are exceeded:

All units are mg/L unless specified

Arsenic (As)	0.27	
Cadmium (Cd)	4.16	
Chromium (Cr)	4.01	
Copper (Cu)	5.15	
Cyanide (CN)	0.29	
Lead (Pb)	0.81	
Nickel (Ni)	4.10	
Zinc (Zn)	5.16	
Mercury (Hg)	0.02	
Silver (Ag)	1.03	
BTEX	16.0	
pH	5.5 SU	(minimum)
pH	10.5 SU	(maximum)
MBAS	90	(daily max)
MBAS	70	(monthly average)
O&G	250	
TPH	100	
CCFP	140° F	(minimum)
NH ₃	100	
TKN	100	

For car wash pit water, the minimum pre-approval testing will include:

Limitation (mg/L if not specified)

Arsenic	0.27
Lead	0.81
BTEX (total)	16.0
Closed Cup Flash Point	140 ° F minimum
COD	
Surfactants (MBAS)	90
Total Petroleum Hydrocarbon	100
Total Dissolved Solids	
Total Suspended Solids	
NH ₃	100
TKN	100

For Landfill Leachate, the minimum pre-approval testing will include:

	<u>Limitation (mg/L, if not specified)</u>
Arsenic	0.27
Cadmium	4.16
Chromium	4.01
Copper	5.15
Lead	0.81
Mercury	0.02
Nickel	4.10
Silver	1.03
Zinc	5.16
BTEX (total)	16.0
Chloroform	
Closed Cup Flash Point	140 ° F minimum
COD	
Hardness	
Sulfate	
Total Petroleum Hydrocarbon	100
Total Phosphorus	
Total Dissolved Solids	
Total Suspended Solids	
Total Toxic Organics	2.13
Volatile Organics by Method 8260	2.13
NH ₃	100
TKN	100

For possible petroleum contaminated water, the minimum pre-approval testing will include:

	<u>Limitation (mg/L if not specified)</u>
Arsenic	0.27
Lead	0.81
BTEX (total)	16.0
Closed Cup Flash Point	140 ° F minimum
COD	
Total Petroleum Hydrocarbon	100
Total Suspended Solids	
NH ₃	100
TKN	100

For wastewaters that do not fit in one of the previous categories, call Water Pollution Control for a list of the minimum pre-approval testing.



UNIFIED GOVERNMENT OF WYANDOTTE COUNTY AND KANSAS CITY, KANSAS
PUBLIC WORKS DEPARTMENT
WATER POLLUTION CONTROL DIVISION
ENVIRONMENTAL COMPLIANCE SECTION

50 MARKET STREET
KANSAS CITY, KANSAS 66118

(913) 573-1300
FAX (913) 573-1351

Special Waste Pre-Approval Application

Responsible Party for the Special Wastewater Conditional Permit (requested by)

(Responsible for adherence to all conditions and limitations on Permit)

Contact Person _____

Company _____

Mailing Address _____

Phone Number _____ Fax Number _____

Responsible Party for the billing **Same as above** _____
(Payment may be required before discharge.)

Contact Person _____

Company _____

Mailing Address _____

Phone Number _____ Fax Number _____

Physical location of the generation of the wastewater

Company Name _____

Address _____

City, State Zip _____

Contact, phone number _____

Type of Wastewater

Approximate volume of wastewater

_____ gallons

Any pretreatment that has been done, or will be done before discharge

If the wastewater is approved, how will it be transported to the discharge facility?

- Hauled by permitted septic hauler
- Discharged to on-site sewer
- Hauled by tanker. If so, name of hauling company _____
- Other, describe below _____

Other relevant comments

All available analytical data must be supplied with this application.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Responsible Party Representative Date

Title of Responsible Party Representative

Appendix E

Hauled Wastewater Ticket Form



**Unified Government of Wyandotte County /
Kansas City, Kansas
WATER POLLUTION CONTROL DIVISION**

HAULED WASTEWATER TICKET

Hauling Company _____ Truck Number _____
 Card Number _____ Tank Size _____ Gal
 Bill Generator _____ Bill Actual Volume _____

The load will be billed to the hauler at 75% of the tank capacity if no change is indicated.

Source(s) of Load

Address	Septic Tank	Restaurant Grease Trap	Permitted Industry Permit #	Portable Toilet	Special Hauled Waste*

* A copy of the manifest or conditional permit must accompany Special Hauled Waste Ticket

I hereby certify this information is true, accurate and complete. I further certify the load does not contain any substances that would be considered a hazardous waste, as specified in Federal, State, or City regulations. I am aware that there are significant penalties for submitting false information, including loss of license and the possibility of fine and imprisonment.

Driver's Signature

Date

White – Water Pollution Control

Canary – Waste Hauler

Pink – Customer Copy

Appendix F

Field Investigation Report Form, Sample Letter and Summary Sheet

UNIFIED GOVERNMENT of WYANDOTTE COUNTY/ KANSAS CITY, KANSAS
WATER POLLUTION CONTROL DIVISION
FIELD INVESTIGATION REPORT

DATE RECEIVED: October 8, 2009 TIME: 14:20 BY: Scott Craig

COMPLAINANT NAME: Butch Radke – Sewer Maintenance PHONE: 913-238-5049

STREET ADDRESS: 50 Market St, Kansas City, KS 66118

PROPERTY OWNER: Rogelio Romo PHONE: 913-281-1120

Martin Cervantes
FACILITY CONTACT 10/14/09 @ 10:20

Taqueria Mexico # 3
STREET ADDRESS: 717 Kansas Avenue Kansas City, KS 66105

NATURE OF COMPLAINT:

Sewer line blocked, found grease blockage, sewage backed-up into property at 617 S Pyle Street. Sewer Maintenance Division cleared line. Total Cost \$211

REFERRED TO:

Scott Craig, WPC

OBSERVATION / RESPONSE / ACTION TAKEN

SAMPLE COLLECTED? YES NO Sample ID _____

SAMPLER: _____ DATE COLLECTED _____ TIME: _____

SAMPLE POINT DESCRIPTION: _____

SAMPLE APPEARANCE: _____

LABORATORY ANALYSIS: _____

(SEE CHAIN OF CUSTODY) _____

See reverse for further information

INDUSTRIAL / COMMERCIAL COMPLAINT

Waste Disposal by N / A

Last Manifest checked (date of shipment) N / A

Type of waste shipped N / A

Quantity of waste shipped N / A

Grease Trap cleaned by N / A Date N / A

RESIDENTIAL COMPLAINT

NOT APPLICABLE

FOLLOW-UP NEEDED or COMMENTS

Water Pollution Control gave copy of Ordinance requiring grease trap installation. Deadline for installation given as November 30, 2009. WPC to verify installation. If no grease trap is installed, all costs for cleanup will be billed to company and any future clean up costs will be assessed to the company. Referred to Anthony Hutchingson of Building Codes (913) 573 – 8630 and Jovana Jankovic of Public Works (913) 573 - 5400 for sewer tap permit information. No visible outside grease trap, indoor under-sink trap cleaned every 2 weeks by staff.

RESPONSE FROM REPRESENTATIVE OR INDIVIDUAL

Mr. Cervantes said the facility has been on-site for 10 years, may or may not install grease trap, will forward to owner.

+++++

SIGNATURE:

October 14, 2009
DATE:



UNIFIED GOVERNMENT OF WYANDOTTE COUNTY AND KANSAS CITY, KANSAS
PUBLIC WORKS DEPARTMENT
WATER POLLUTION CONTROL DIVISION
ENVIRONMENTAL COMPLIANCE SECTION

50 MARKET STREET
KANSAS CITY, KANSAS 66118

(913) 573-1300
FAX (913) 573-1351

October 14, 2009

Rogelio Romo
Taqueria Mexico #3
717 Kansas Avenue
Kansas City, KS 66105

RE: Grease blockage in sewer

Mr. Romo,

The Sewer Maintenance Division of Water Pollution Control discovered a blockage in the sewer from your facility. The blockage was removed on October 9, 2009. Previously, Water Pollution Control responded to the area on February 12, 2009 and April 6, 2009. As a result of these blockages, your facility will be required to install an acceptable grease trap. Section 30-128 of the Code of Ordinances references the requirement. A copy of the Section was left during the inspection today.

You have until November 30, 2009 to install the grease trap. Be sure to contact the Building Codes Division and Public Works for any required permits. As soon as the grease trap is installed, contact me to close the file. If the grease trap is not installed by that date, all costs for the previous cleanups will be assessed to your company.

If you have any further questions, feel free to call me at (913) 573 – 1313, or by email at scraig@wycokck.org.

Sincerely,

Scott Craig
Environmental Compliance Superintendent

cc: Anthony Hutchingson, Codes
John Cotter, Health Department
Butch Radke, Sewer Maintenance

Appendix G

Grease Trap/Interceptor Maintenance Log

Appendix H

Employee BMP Training Log

Appendix I

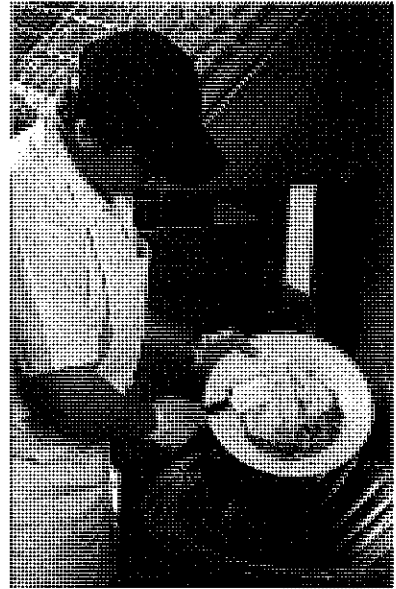
Kitchen BMP Document

Kitchen Best Management Practices (BMPs) Document

There are many actions a facility can take to ensure fats, oils and greases do not go down the drain. The County is requiring the following BMPs:

Typical BMPs

- ✔ Scrape grease and food waste from plates and pots before washing and place the waste into the trash
- ✔ Install drain screens on all sinks and floor drains
- ✔ Clean and maintain grease abatement devices regularly to perform correctly
- ✔ Limit garbage disposal usage to non-greasy food materials such as lettuce
- ✔ Use spill kits and absorbent materials to prevent grease spills from entering drains
- ✔ Post educational materials throughout the facility



Additional BMPs

- Update and complete yellow grease collection log
- Update and complete grease abatement device maintenance log
- Properly dispose of fryer (yellow) grease with approved system and carrier
- Conduct periodic refresher training for all employees
- Conduct lateral line cleaning
 - Quarterly
 - Semi-Annually
 - Annually
- Properly dispose of hood cleaning waste to a grease abatement device or have waste disposed off site.
- Provide specific operation and equipment details related to food storage, preparation, service and disposal



***Please list any additional BMPs your facility will be implementing. Thank you for doing your part in preventing FOG discharge.**

Appendix J

Food Service Facility Inventory List (2012)

UNIFIED GOVERNMENT OF WYANDOTTE COUNTY/KANSAS CITY, KANSAS
FOG Control Program

FOOD SERVICE FACILITY INVENTORY LIST

GI Operating No. Permit	Name Food Service Facility	Address	Phone	Name Contact	Type Facility	GI Permit Date Issuance	GI Date Install	Date Reinspection	Operating Renewed Permit	Status	Comments	Permit No. BPU Operating
	18TH STREET STOP & GO	164 S 18TH ST, KANSAS CITY, KS 66102			CONVENIENCE STORE							
	5TH AVENUE CONVENIENCE MART	2101 N. 5TH ST, KANSAS CITY, KS			GROCERY STORE							
	20 MEN CLUB INC	2724 N13TH ST, KANSAS CITY, KS 66104			RESTAURANT							
	403 CLUB	403 N 5TH ST, KANSAS CITY, KS 66101			RESTAURANT							
	610 CLUB	610 REYNOLDS AVE KANSAS CITY, KS 66101	(913) 342-6441		RESTAURANT						Accommodation-Food Services - Special Food Services	99980-00000-03500
	4-H CONCESSION	9400 STATE AVE, KANSAS, KS			RESTAURANT							
	7 ELEVEN STORE #13242D	2924 S 47TH ST, KANSAS CITY, KS 66106			CONVENIENCE STORE							
	7 ELEVEN STORE #13245D	2500 CENTRAL AVE, KANSAS CITY, KS 66102			CONVENIENCE STORE							
	7 ELEVEN STORE #35783	10950 PARALLEL PKWY, KANSAS CITY, KS 66109			CONVENIENCE STORE							
	7TH STREET APPLE MARKET	712 STATE AVE, KANSAS CITY, KS			GROCERY STORE							
	7TH STREET BARBECUE	709 CHEYENNE AVE KANSAS CITY, KS 66105	(913) 371-1599		RESTAURANT						Accommodation-Food Services - Limited-Service Eating Places	99980-00000-00564
	7TH STREET CAFE	210 S 7TH TRWY KANSAS CITY, KS 66101	(913) 281-0838		RESTAURANT						Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01146
	7TH STREET CONOCO	616 S 7TH ST TFCWY, KANSAS CITY, KS 66105			CONVENIENCE STORE							
	A SISTER WITH ELEGANCE CATERING	3800 WEAVER DR KANSAS CITY, KS 66104	(913) 321-4639		RESTAURANT						Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00096
	ABARROTOS DELICIAS	3612 STATE AVE, KANSAS CITY, KS 66102			GROCERY STORE							
	ABARROTOS FUENTE DE DIOS	3726 EVERETT AVE, KANSAS CITY, KS 66102			GROCERY STORE							
	ACE LOUNGE & RESTAURANT	508 KANSAS AVE, KANSAS CITY, KS 66105			RESTAURANT							
	ACTION COFFEE SERVICE INC	1400 N 13TH ST, KANSAS CITY, KS 66102			FOOD PROCESSING							
	AJMERS LUNCHBOX	7355 LEAVENWORTH, KANSAS CITY, KS			RESTAURANT							
	ALDI INC #84	4802 STATE AVE, KANSAS CITY, KS 66102			GROCERY STORE							
	ALDI INC #84	4805 STATE AVE, KANSAS CITY, KS			GROCERY STORE							
	ALL AMERICAN DINER	753 MINNESOTA, KANSAS CITY, KS			RESTAURANT							
	ALL AMERICAN DINER	754 MINNESOTA, KANSAS CITY, KS 66101			RESTAURANT							
	ALL AMERICAN DINER	756 STATE AVE KANSAS CITY, KS 66101	(913) 281-7881		RESTAURANT						Accommodation-Food Services - Drinking Places (Alcohol)	10980-00486
	ALMA LATINO AMERICANA	3724 STATE AVE, KANSAS CITY, KS 66102			GROCERY STORE							
	ALMA LATINO AMERICANA	3726 EVERETT AVE, KANSAS CITY, KS 66102			GROCERY STORE							
	ALOHA CHOPSTIX	4316 RAINBOW BLVD KANSAS CITY, KS 66103	(913) 677-6789		RESTAURANT						Accommodation-Food Services - Full-Service Restaurants	99980-00000-03481
	AMAZING DINER & DELI	840 S 55TH STREET, KANSAS CITY, KS			RESTAURANT							
	AMER LEGION-ARMOURDALE POST #188	957 OSAGE, KANSAS CITY, KS 66105			RESTAURANT							
	AMERICAN FOOD & VENDING SERVICE OF MISSOURI INC.	3201 FAIRFAX RD KANSAS CITY, KS 66115	(913) 573-7590		RESTAURANT						Accommodation-Food Services - Full-Service Restaurants	03980-00000-00489
	AMERICAN MOTEL	7949 SPLITLOG AVE, KANSAS CITY, KS			LODGING							
	AMERICAN SUNDAYS	72714 SLOAN AVE, KANSAS CITY, KS			RESTAURANT							
	AMIGO'S GRILL & CANTINA	2737 S 47TH, KANSAS CITY, KS 66106			RESTAURANT							
	AMIGO'S OF THE DOTTE, LLC.(AMERICAN GRILL & CANTINA)	1709 STEELE RD KANSAS CITY, KS 66106	(913) 766-3300		RESTAURANT						Accommodation-Food Services - Limited-Service Eating Places	09980-00790
	AMOCO BP	300 N 78TH ST, KANSAS CITY, KS 66112			GROCERY STORE							
	ANDREAS DOLLAR SAVER	947 MINNESOTA AVE, KANSAS CITY, KS			GROCERY STORE							
	ANNA'S BREAKFAST LUNCH DINNER BISTRO	2959 N 7TH ST, KANSAS CITY, KS 66101			RESTAURANT							
	APPLEBEE'S NEIGHBORHOOD GRILL & BAR	3404 RAINBOW BLVD, KANSAS CITY, KS 66103	(913) 236-4224		RESTAURANT						Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00839
	APPLEBEE'S NEIGHBORHOOD GRILL & BAR	1700 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 788-9421		RESTAURANT						Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00840
	APRIL'S FIRELIGHT LOUNGE, INC.	2046 N 18TH ST KANSAS CITY, KS 66104	(913) 371-8743		RESTAURANT						Accommodation-Food Services - Drinking Places-Alcohol	99980-00000-01947
	ARBY'S #6012	7500 STATE AVE KANSAS CITY, KS 66112	(913) 334-4080		RESTAURANT						Accommodation-Food Services - Full-Service Restaurants	99980-00000-03042
	ARBY'S #8254	10930 PARALLEL PKWY KANSAS CITY, KS 66109	(913) 299-8334		RESTAURANT						Accommodation-Food Services - Limited-Service Eating Places	08980-00000-00458
	ARENOSAS MEXICAN FOOD INC	1203 KANSAS AVE, KANSAS CITY, KS 66105			RESTAURANT							
	ARGENTINE COMMUNITY CENTER	2810 METROPOLITAN, KANSAS CITY, KS			RESTAURANT							
	ARGENTINE MIDDLE SCHOOL	2123 RUBY AVE., KANSAS CITY KS 66106			SCHOOL							
	ARGENTINE SMOKE & PARTY SHOP	3204 STRONG AVE, KANSAS CITY, KS 66106			CONVENIENCE STORE							
	ARGENTINE THRIFT	3012 STRONG AVE, KANSAS CITY, KS			GROCERY STORE							
	ARROWHEAD JUNIOR HIGH	1715 N 82ND, KANSAS CITY, KS 66112			SCHOOL							
	ARTHUR BRYANTS LEGENDS	1702 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 788-7500		RESTAURANT						Exempt - Exempt	04980-00000-00478
	ARTS MEXICAN PRODUCTS INC	615 KANSAS AVE, KANSAS CITY, KS 66105			GROCERY STORE							
	ARTS MEXICAN PRODUCTS INC.	615 KANSAS AVE, KANSAS CITY, KS 66105			FOOD PROCESSING							
	ASHLAND DISTRIBUTION	5420 SPEAKER RD, KANSAS CITY, KS 66106			FOOD PROCESSING							
	AUNTIE ANN'S SOFT PRETZELS	1803 VILLAGE WEST PKWY STE M111, KANSAS CITY, KS 66111			RESTAURANT							
	AYS	803 ARMSTRONG, KANSAS CITY, KS			RESTAURANT							
	BACKFIRE BARBEQUE	1855 VILLAGE WEST PKWY 101 KANSAS CITY, KS 66111	(913) 788-3838		RESTAURANT						Accommodation-Food Services - Limited-Service Eating Places	09980-01182
	BAGEL WORKS CAFÉ INC	1523 S 45TH ST, KANSAS CITY, KS 66106			FOOD PROCESSING							
	BAKED EXPRESSIONS LLC	11 S. 7TH ST, KANSAS CITY, KS			RESTAURANT							
	BANNER ELEMENTARY	2026 N FOURTH, KANSAS CITY, KS 66101			SCHOOL							
	BAR NONE LOUNGE	1200 OSAGE AVE, KANSAS CITY, KS 66105	(913) 371-0205		RESTAURANT						Accommodation-Food Services - Limited-Service Eating Places	99980-00000-04430
	BARGAIN HUNTERS PARADISE	915 MINNESOTA, KANSAS CITY, KS			GROCERY STORE							
	BARIK PETROLEUM, INC	13815 POLFER, KANSAS CITY, KS			GROCERY STORE							
	BEAR CLAW CAFÉ	10401 CABELA DR. KANSAS CITY, KS 66111			RESTAURANT							
	BELIEVERS CENTER OF THE FUTURE	608 N 18TH ST KANSAS CITY, KS 66102	(913) 621-6070		RESTAURANT						Accommodation-Food Services - Full-Service Restaurants	99980-00000-03767
	BELLA CAFÉ & ICE CREAM	3124 STRONG AVE, KANSAS CITY, KS 66106			RESTAURANT							
	BELL'S TOWER PLAZA MCDONALDS	3725 STATE AVE KANSAS CITY, KS 66102	(913) 371-0606		RESTAURANT						Accommodation-Food Services - Full-Service Restaurants	99980-00000-01159
	BERMUDAS	6220 KANSAS AVE, KANSAS CITY, KS			RESTAURANT							
	BERNICE'S FOODS INC	6000 J LEAVENWORTH RD, KANSAS CITY, KS 66104			FOOD PROCESSING							
	BEST HARVEST BAKERIES	530 S 65TH ST, KANSAS CITY, KS 66111			FOOD PROCESSING							
	BEST WESTERN KC SPEEDWAY INN & SUITES	10401 FRANCE FAMILY DR, KANSAS CITY, KS 66111			RESTAURANT							
	BETHEL ELEMENTARY	7850 YECKER, KANSAS CITY, KS 66109			SCHOOL							
	BETHEL NEIGHBORHOOD CENTER	14 SOUTH 7TH STREET, KANSAS CITY, KS			RESTAURANT							



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BICHELEMEYER MEATS	704 CHEYENNE, KANSAS CITY, KS			GROCERY STORE				
BIG D ON THE HILL	2139 S 34TH ST KANSAS CITY, KS 66106	(913) 208-1334		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00469	
BIG GRILL & MORE, LLC.	501 N 6TH ST KANSAS CITY, KS 66101	(913) 371-0088		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	09980-00994	
BIG JOHN'S GRILL/GRILL CART	1800 VILLAGE WEST PKWY, KANSAS CITY, KS			RESTAURANT				
BIG LOTS #1019	7533 STATE STATE AVE, KANSAS CITY, KS			GROCERY STORE				
BIG MAMA'S RUSH HOUR, LLC	3204 PARALLEL PKWY KANSAS CITY, KS 66104	(913) 621-7406		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	09980-00667	
BIG PAPA'S BAR B QUE	5827 LEAVENWORTH ROAD, KANSAS CITY, KS			RESTAURANT				
BIG Q INC, THE	2117 S 34TH ST KANSAS CITY, KS 66106	(913) 362-6980		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-01466	
BILL'S 32 WEST	6500 KAW DR KANSAS CITY, KS 66111	(913) 788-3843		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	09980-00906	
BIMBO BAKERIES USA	4435 SHAWNEE DR, KANSAS CITY, KS 66106			FOOD PROCESSING				
BIRRIERIA MICHOACANA	78 N 10TH ST, KANSAS CITY, KS 66102			RESTAURANT				
BISHOP WARD HIGH SCHOOL	708 N 18TH STREET, KANSAS CITY, KS			RESTAURANT				
BLACK KETTLE COFFEE	3730 SPRINGFIELD ST, KANSAS CITY, KS			GROCERY STORE				
BLUE ROSES (THE)	1013 CENTRAL AVE, KANSAS CITY, KS 66102			RESTAURANT				
BLUE SKY	3612 STATE AVE, KANSAS CITY, KS 66102			GROCERY STORE				
BOB EVANS FARMS, INCORPORATED #489	1704 VILLAGE WEST PKWY KANSAS CITY, KS 66109	(614) 491-2225		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00549	
BOND PHARMACY	3017 STRONG, KANSAS CITY, KS			GROCERY STORE				
BONITO MICHOACAN	1150 MINNESOTA AVE, KANSAS CITY, KS 66102			GROCERY STORE				
BONITO MICHOACAN	1200 MINNESOTA, KANSAS CITY, KS 66102			RESTAURANT				
BOULEVARD DRIVE IN THEATRE	1051 MERRIAM LN, KANSAS CITY, KS 66103			RESTAURANT				
BOUTIQUE BOWL OF KANSAS, LLC D/B/A PIN-UP BOWL	1859 VILLAGE WEST PKWY STE 101 KANSAS CITY, KS 66111	(913) 371-1944		RESTAURANT		Accommodation-Food Services - Drinking Places-Alcohol	06980-00000-00348	
BOYERT DONUT HOLE LLC	2131 S 34TH ST, KANSAS CITY, KS 66106			RESTAURANT				
BP ON 5TH	900 N 5TH ST, KANSAS CITY, KS 66101			CONVENIENCE STORE				
BP SHORT STOP	7647 LEAVENWORTH RD, KANSAS CITY, KS 6109			CONVENIENCE STORE				
BRANCATO'S CATERING	5050 KANSAS AVE, KANSAS CITY, KS			RESTAURANT				
BRANDY'S OLD HOUSE KITCHEN MU	1614 RUBY AVE, KANSAS CITY, KS			RESTAURANT				
BRASS RING	5648 STATE AVE KANSAS CITY, KS 66102	(913) 287-8686		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-05173	
BRAVO BURRITOS	1268 KANSAS AVE KANSAS CITY, KS 66105	(913) 621-0940		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-05675	
BREIT'S STEIN & DELI	412 N 5TH ST KANSAS CITY, KS 66101	(913) 342-5311		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	02980-00000-00831	
BRIDGES ALTERNATIVE	3101 N TENTH, KANSAS CITY, KS 66104			SCHOOL				
BUBBLE ROOM	1700 CENTRAL AVE, KANSAS CITY, KS			RESTAURANT				
BURGER JOINT	3212 MERRIAM LN, KANSAS CITY, KS			RESTAURANT				
BURGER KING #10191	3610 STATE AVE, KANSAS CITY, KS 66102	(913) 621-3131		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-04725	
BURGER KING #10999	4004 RAINBOW BLVD KANSAS CITY, KS 66103	(913) 362-5738		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-05199	
BURGER KING #10191	3610 STATE AVE, KANSAS CITY, KS 66102			RESTAURANT				
BURGER KING #3732	7736 STATE AVE KANSAS CITY, KS 66112	(913) 334-9480		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-01266	
BURGER KING REST	4004 RAINBOW BLVD, KANSAS CITY, KS 66103			RESTAURANT				
BURGER STOP	748 WASHINGTON BLVD, KANSAS CITY, KS 66101			RESTAURANT				
BURGER TO GO	625 CENTRAL AVE, KANSAS CITY, KS 66101			RESTAURANT				
BURGER TO GO	631 CENTRAL AVE KANSAS CITY, KS 66101	(913) 980-6355		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	09980-01122	
BURRITOS EL COMETA	6706 KAW DR KANSAS CITY, KS 66111	(913) 514-2691		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	09980-00038	
BURRITOS LA CHIQUITA	1328 MINNESOTA AVE C KANSAS CITY, KS 66102	(816) 694-5161		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	10980-00470	
BURRITOS TO GO	701 B CENTRAL AVE KANSAS CITY, KS 66101	(913) 328-0824		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	04980-00000-00613	
BURRITOS TO GO EXPRESS	265 N 7TH ST, KANSAS CITY, KS 66101			RESTAURANT				
BURRITOS Y ALGO MAS	265 N 7TH ST KANSAS CITY, KS 66101	(913) 636-9872		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	10980-00548	
BURTON, INC., D/B/A C & R	4210 LEAVENWORTH RD KANSAS CITY, KS 66104	(913) 287-6842		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-04424	
BUTCHER BLOCK/HOMEPLATE BAR C & R	1800 VILLAGE WEST PKWY, KANSAS CITY, KS			RESTAURANT				
	4200 LEAVENWORTH RD, KANSAS CITY, KS			RESTAURANT				
CABELA'S (MU 1397)	10300 CABELA DR, KANSAS CITY, KS 66111			GROCERY STORE				
CAFÉ 500	2010 N 59TH ST, KANSAS CITY, KS			RESTAURANT				
CAFÉ 625	625 MINNESOTA AVE, KANSAS CITY, KS			RESTAURANT				
CAFÉ CHIPILO	724 MINNESOTA AVE, KANSAS CITY, KS			RESTAURANT				
CALIFORNIA FAST FOOD	1103 KANSAS AVE, KANSAS CITY, KS			RESTAURANT				
CAMP CRITTER BAR & GRILL	10401 CABELA DR, KANSAS CITY, KS 66111			RESTAURANT				
CANCUN FIESTA FRESH, LLC.	503 N 7TH TRFY KANSAS CITY, KS 66101			RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	08980-00689	
CANDLEWOOD SUITES	10920 PARALLEL PKWY, KANSAS CITY, KS 66109			GROCERY STORE				
CAPTAIN D'S SEAFOOD	7525 STATE AVE KANSAS CITY, KS 66112	(913) 299-3034		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-01812	
CARAVAN INGREDIENTS	550 S 65TH ST, KANSAS CITY, KS 66111			FOOD PROCESSING				
CARINO'S ITALIAN	1706 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 299-8253		RESTAURANT		Accommodation-Food Services - Drinking Places-Alcohol	05980-00000-00674	
CARNICERIA CAMECUARO #1 LLC	1411 ORVILLE AVE, KANSAS CITY, KS			GROCERY STORE				
CARNICERIA CAMECUARO #5 LLC	309 N 7TH ST, KANSAS CITY, KS			GROCERY STORE				
CARNICERIA EL TORITO II	1409 CENTRAL AVE, KANSAS CITY, KS 66102			GROCERY STORE				
CARNICERIA Y TORTILLERIA SAN ANTONIO	7510 STATE AVE, KANSAS CITY, KS 66112			GROCERY STORE				
CARNICERIA Y TORTILLERIA SAN ANTONIO	830 KANSAS AVE KANSAS CITY, KS 66105	(913) 281-6433		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	05980-00000-00427	
CARNICERIA Y TORTILLERIA SAN ANTONIO	7510 STATE AVE, KANSAS CITY, KS 66112			FOOD PROCESSING				
CARNICERIA Y TORTILLERIA SAN ANTONIO, INC	7510 STATE AVE KANSAS CITY, KS 66112	(913) 636-5736		RESTAURANT		Accommodation-Food Services - Drinking Places-Alcohol	10980-00497	
CARSTEN CONCESSIONS 3	20932 SHADY GROVE RD, KANSAS CITY, KS			RESTAURANT				
CARUTHERS ELEMENTARY	11TH & WAVERLY, KANSAS CITY, KS 66101			SCHOOL				
CASA AGAVE	1314 VILLAGE WEST PKWY, KANSAS CITY, KS			RESTAURANT				
CASA DE HERNANDEZ	1817 PARK DR KANSAS CITY, KS 66102	(913) 342-6226		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	01980-00000-00004	
CASA DE LA QUINCENERA	829 MINNESOTA AVE KANSAS CITY, KS 66101	(913) 915-0583		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00663	
CASEY'S GENERAL STORE #2876	13000 STATE AVE, KANSAS CITY, KS 66109			CONVENIENCE STORE				
CASINO BAR	1100 OSAGE AVE KANSAS CITY, KS 66105	(913) 281-5800		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-06337	
CAULDRON ROOM	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
CENTRAL AVENUE CTR OF HOPE INC	11 N 15TH, KANSAS CITY, KS 66102			RESTAURANT				

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CENTRAL JUNIOR HIGH	925 IVANDALE, KANSAS CITY, KS 66101			SCHOOL				
CENTRAL KITCHEN UNIT	2112 N 18TH, KANSAS CITY, KS 66104			SCHOOL				
CENTAL STATES CONFERENCE/YOUTH CENTER	3301 PARALLEL PKWY, KANSAS CITY, KS			RESTAURANT				
CEREAL FOOD PROCESSORS	56 SILVER ST, KANSAS CITY, KS 66103			FOOD PROCESSING				
CHAMPS SPORTS CLUB LLC	2418 ARK DR, KANSAS CITY, KS 66102			RESTAURANT				
CHARLIE D'S OCEAN MAGIC CATFISH	1000 N 82ND ST, KANSAS CITY, KS			RESTAURANT				
CHAS BALL MARKET INC	4601 PARALLEL, KANSAS CITY, KS 66104			GROCERY STORE				
CHAS BALL MARKET INC	241 S 18TH ST, KANSAS CITY, KS 66102			GROCERY STORE				
CHATEAU AVALON	701 VILLAGE WEAT PKWY, KANSAS CITY, KS			LODGING				
CHEESEBURGER IN PARADISE	1705 VILLAGE WEST PKWY, KANSAS CITY, KS			RESTAURANT				
CHEESEBURGER OF KANSAS CITY, LLC.	1705 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 334-4500		RESTAURANT			Accomodation-Food Services - Limited-Service Eating Places	04980-00000-00906
CHELSEA ELEMENTARY SCHOOL	2500 WOOD, KANSAS CITY, KS 66104			SCHOOL				
CHELSEA PLAZA	566 FREEMAN COURT, KANSAS CITY, KS			RESTAURANT				
CHICAGO'S	534 CENTRAL AVE KANSAS CITY, KS 66101	(913) 281-9744		RESTAURANT			Accomodation-Food Services - Full-Service Restaurants	99980-00000-03688
CHICK-FIL-A	10770 PARALLEL PKWY, KANSAS CITY, KS 66109			RESTAURANT				
CHILI'S GRILL & BAR	1710 VILLAGE WEST PKWY, KANSAS CITY, KS 66111			RESTAURANT				
CHIN HILLS ASIAN GROCERY	211 N 18TH ST, KANSAS CITY, KS 66102			GROCERY STORE				
CHINA BUFFET	7914 STATE AVE KANSAS CITY, KS 66112	(913) 334-1389		RESTAURANT			Accomodation-Food Services - Full-Service Restaurants	99980-00000-04320
CHINA FEAST	1317 N 38TH ST KANSAS CITY, KS 66102	(913) 573-2300		RESTAURANT			Accomodation-Food Services - Full-Service Restaurants	09980-00779
CHINA TOM'S, INC	2816 W 47TH AVE KANSAS CITY, KS 66103	(913) 432-1597		RESTAURANT			Accomodation-Food Services - Limited-Service Eating Places	99980-00000-05921
CHINATOWN SUPER BUFFET	151 S 18TH ST Y KANSAS CITY, KS 66102	(913) 281-2888		RESTAURANT			Accomodation-Food Services - Limited-Service Eating Places	10980-00251
CHIPOTLE MEXICAN GRILL OF KANSAS, LLC.	1813 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 299-9221		RESTAURANT			Accomodation-Food Services - Limited-Service Eating Places	06980-00000-00865
CHIVSANO'S BRICK OVEN PIZZERIA	1713 VILLAGE WEST PKWY, KANSAS CITY, KS 66111			RESTAURANT				
CHRIST THE KING SCHOOL	3027 N 54TH ST, KANSAS CITY, KS 66104			SCHOOL				
CHRISTYS TASTY QUEEN	1405 S 55TH ST KANSAS CITY, KS 66106	(913) 287-2800		RESTAURANT			Accomodation-Food Services - Limited-Service Eating Places	99980-00000-01596
CHURCHS CHICKEN	8234 PARALLEL PKWY, KANSAS CITY, KS 66112			RESTAURANT				
CHURCHS CHICKEN	1222 CENTRAL AVE, KANSAS CITY, KS 66102			RESTAURANT				
CHURCH'S CHICKEN	8234 PARALLEL PKWY KANSAS CITY, KS 66112	(913) 499-6771		RESTAURANT			Accomodation-Food Services - Full-Service Restaurants	10980-00483
CHURCH'S CHICKEN	5501 LEAVENWORTH RD KANSAS CITY, KS 66104	(913) 287-5282		RESTAURANT			Accomodation-Food Services - Drinking Places-Alcohol	99980-00000-05826
CHURCH'S CHICKEN #236	1222 CENTRAL AVE KANSAS CITY, KS 66102	(913) 342-9273		RESTAURANT			Accomodation-Food Services - Limited-Service Eating Places	06980-00000-00354
CIRCLE K #6200	4701 STATE AVE, KANSAS CITY, KS 66102			CONVENIENCE STORE				
CITGO FOOD STORE CORP #2	50 S 10TH ST, KANSAS CITY, KS 66102			CONVENIENCE STORE				
CITY FISH & MORE	2704 STATE AVE, KANSAS CITY, KS 66102			RESTAURANT				
CLAUDE A HUYCK ELEMENTARY	1530 N 83RD, KANSAS CITY, KS 66112			SCHOOL				
CLUB EL PARAISO, INC	6550 KAW DR KANSAS CITY, KS 66111	(708) 299-5859		RESTAURANT			Accomodation-Food Services - Limited-Service Eating Places	10980-00533
CLUB SERRANO	975 KANSAS AVE, KANSAS CITY, KS			RESTAURANT				
CLUB SPARKS	1436 KANSAS AVE KANSAS CITY, KS 66105	(913) 233-1099		RESTAURANT			Accomodation-Food Services - Full-Service Restaurants	06980-00000-01081
CLUB UNDERGROUND	751 MINNESOTA AVE, KANSAS CITY, KS 66101			RESTAURANT				
CMACS SMOOTHIES	1734 S 49TH, KANSAS CITY, KS			RESTAURANT				
COACHLITE CLUB	2103 S 34TH ST KANSAS CITY, KS 66106	(913) 722-1647		RESTAURANT			Accomodation-Food Services - Limited-Service Eating Places	99980-00000-04772
COLD STONE CREAMERY	1865 VILLAGE WEST PKWY, KANSAS CITY, KS			RESTAURANT				
COLONIAL CLUB	322 N 6TH ST KANSAS CITY, KS 66101	(913) 371-1103		RESTAURANT			Accomodation-Food Services - Full-Service Restaurants	99980-00000-05295
COME-N-GO LLC	1800 STEEL RD, KANSAS CITY, KS 66106			CONVENIENCE STORE				
COMFORT SUITES SPEEDWAY	3000 N 103RD TERRACE, KANSAS CITY, KS			LODGING				
CONCESSION STAND 101	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
CONCESSION STAND 114	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
CONCESSION STAND 117	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
CONCESSION STAND 119	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
CONCESSION STAND 122	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
CONCESSION STAND 127	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
CONCESSION STAND 129	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
CONCESSION STAND 134	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
CONCESSIONS BY PEREZ (MU 0389)	3159 W 46TH, KANSAS CITY, KS			RESTAURANT				
CONOCO SHORT STOP #103	308 N 18TH, KANSAS CITY, KS 66102			CONVENIENCE STORE				
CORAZON SALUDABLE	1616 CENTRAL AVE, KANSAS CITY, KS 66102			RESTAURANT				
CORNER (THE)	2001 N 5TH, KANSAS CITY, KS 66101			RESTAURANT				
CORONADO JUNIOR HIGH	1735 N 64TH TERR, KANSAS CITY, KS 66102			SCHOOL				
COUNTRY INN & SUITES	1805 N 110TH ST, KANSAS CITY, KS			LODGING				
COURTYARD CAFÉ	3901 RAINBOW BLVD, KANSAS CITY, KS 66103			RESTAURANT				
CREST MOTEL	8600 STATE AVE, KANSAS CITY, KS			LODGING				
CROSS LINES COMMUNITY OUTREACH	736 SHAWNEE AVE, KANSAS CITY, KS			RESTAURANT				
CROSS LINES COMMUNITY OUTREACH	646 S 7TH TRAFFICWAY, KANSAS CITY, KS			RESTAURANT				
C-STORE 1	6828 KAW DR, KANSAS CITY, KS 66111			CONVENIENCE STORE				
CULVERS OF KANSAS CITY KANSAS	1925 PRAIRIE CROSSING, KANSAS CITY, KS 66111			RESTAURANT				
CVS PHARMACY #8584	950 MINNESOTA AVE, KANSAS CITY, KS			GROCERY STORE				
CVS PHARMACY #8600	8101 STATE AVE, KANSAS CITY, KS			GROCERY STORE				
CVS PHARMACY #8603	3750 STATE AVE, KANSAS AVE, KANSAS CITY, KS			GROCERY STORE				
CVS PHARMACY #8608	4645 SHAWNEE DR, KANSAS CITY, KS			GROCERY STORE				
CVS PHARMACY #8919	4300 RAINBOW BLVD			GROCERY STORE				
D D EISENHOWER JUNIOR HIGH	2901 N 72ND, KANSAS CITY, KS 66109			SCHOOL				
DADS HOLE IN THE WALL	1111 N 50TH TER KANSAS CITY, KS 66102	(913) 944-1212		RESTAURANT			Accomodation-Food Services - Full-Service Restaurants	10980-00819
DAGWOODS CAFÉ	1117 SW BOULEVARD, KANSAS CITY, KS 66103			RESTAURANT				
DAIRY QUEEN	315 SOUTHWEST BLVD KANSAS CITY, KS 66103	(913) 236-8698		RESTAURANT			Accomodation-Food Services - Limited-Service Eating Places	99980-00000-01038
DANNY'S BAR & GRILL	10940 PARALLEL PKWY #Q KANSAS CITY, KS 66109	(913) 328-0247		RESTAURANT			Accomodation-Food Services - Special Food Services	05980-00000-01265
DAVE & BUSTER'S OF KANSAS, INC.	1843 VILLAGE WEST PKWY #201 KANSAS CITY,, KS 66109	(913) 981-6815		RESTAURANT			Accomodation-Food Services - Special Food Services	05980-00000-01156

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DAVID'S PIZZA & TAQUERIA	5512 LEAVENWORTH RD KANSAS CITY, KS 66104	(913) 548-9670	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	10980-00802
DAV BINGO	8040 PARALLEL PKWY, KANSAS CITY, KS		RESTAURANT		
DAYS INN - KANSAS SPEEDWAY	7721 ELIZABETH ST		LODGING		
DD EISENHOWER JUNIOR HIGH	2901 N 72ND, KANSAS CITY, KS 66109		RESTAURANT		
DECO CATERING INC.(MU 6321 & MU 6236)	1407 SOUTHWEST BLVD KANSAS CITY, KS 66103	(913) -70-8375	RESTAURANT	Accommodation-Food Services - Special Food Services	09980-00753
DELAWARE RIDGE ELEMENTARY SCHOOL	1601 N 130TH, KANSAS CITY, KS 66109		SCHOOL		
DELECTABLE DESIGNS CATERING, LLC	4480A WEST DR, KANSAS CITY, KS 66109	(913) 299-2007	RESTAURANT	Accommodation-Food Services - Drinking Places-Alcohol	08980-00000-00446
DELECTABLE DESIGNS CATERING, LLC	4400 WEST DR, KANSAS CITY KS		RESTAURANT		
DELHI'S SOUTHERN CUISINE	8055 STATE AVE KANSAS CITY, KS 66112	(913) 299-6400	RESTAURANT	Accommodation-Food Services - Limited-Service Eating Places	10980-00148
DELICIAS	1704 CENTRAL AVE KANSAS CITY, KS 66102	(913) 522-0410	RESTAURANT	Accommodation-Food Services - Drinking Places-Alcohol	08980-00000-00146
DESSERTS BY ANGIE	1220 N 79TH ST, KANSAS CITY, KS 66112		FOOD PROCESSING		
DISCOUNT SMOKES & TOBACCO	4828 PARALLEL PKWY, KANSAS CITY, KS 66104		CONVENIENCE STORE		
DIXIE'S	1042 CENTRAL AVE KANSAS CITY, KS 66102	(913) 342-4145	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	09980-01199
DNS FOODMART INC	3440 RAINBOW BLVD, KANSAS CITY, KS 66103		CONVENIENCE STORE		
DOLLAR GENERAL #12098	6028 LEAVENWORTH, KANSAS CITY, KS		GROCERY STORE		
DOLLAR GENERAL #13666	6448 KAW DR, KANSAS CITY, KS		GROCERY STORE		
DOLLAR GENERAL #13010	2100 METROPOLITAN AVE, KANSAS CITY, KS		GROCERY STORE		
DOLLAR GENERAL #13541	2272 QUINDARO, KANSAS CITY, KS		GROCERY STORE		
DOLLAR GENERAL #1603	2801 S 47TH ST, STE A, KANSAS CITY, KS		GROCERY STORE		
DOLLAR GENERA #5735	3716 STATE AVE, KANSAS CITY, KS		GROCERY STORE		
DOLLAR GENERAL #6716	8144 PARALLEL PKWY, KANSAS CITY, KS		GROCERY STORE		
DOLLAR GENERAL #7478	2852 W. 47TH STREET, KANSAS CITY, KS		GROCERY STORE		
DOLLAR GENERAL #1430	7650 STATE AVE, KANSAS CITY, KS		GROCERY STORE		
DONNELL'S PARTY SHOP	1103 QUINDARO BLVD, KANSAS CITY, KS 66104		CONVENIENCE STORE		
DONNELLY STUDENT CENTER	608 N 18TH ST KANSAS CITY, KS 66102	(913) 621-6070	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	99980-00000-01424
DOTLANDER CLUB	1705 CENTRAL AVE KANSAS CITY, KS 66102	(913) 233-1872	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	02980-00000-00863
DOUBLE D CONCESSIONS	218 OHIO, KANSAS CITY, KS		RESTAURANT		
DOUBLE TS ROADHOUSE	1421 MERRIAM, KANSAS CITY, KS 66103		RESTAURANT		
DOUGLASS ELEMENTARY	9TH & WASHINGTON, KANSAS CITY, KS 66101		SCHOOL		
DUB'S DREAD GOLF CLUB	12601 HOLLINGSWORTH RD KANSAS CITY, KS 66109	(913) 721-1333	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	02980-00000-00311
DULCERIA EL COMETA	1505 1/2 CENTRAL AVE		GROCERY STORE		
DRINK A LATTE LLC	3900 RAINBOW BLVD, KANSAS CITY, KS		RESTAURANT		
EAGLE GOLF D/B/A PAINTED HILLS GOLF COURSE	7101 PARALLEL PKWY KANSAS CITY, KS 66112	(913) 334-1111	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	04980-00000-00436
EARTH GRAINS BAKING COMPANIES INC	7565 STATE AVE, KANSAS CITY, KS		GROCERY STORE		
EDUCATION CENTER	4601 STATE AVE, KANSAS CITY, KS		RESTAURANT		
EL CAMARONCITO	1022 CENTRAL AVE KANSAS CITY, KS 66102	(913) 621-1200	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	05980-00000-00273
EL CAMINO REAL	903 N 7TH TRWY KANSAS CITY, KS 66101	(913) 342-4333	RESTAURANT	Accommodation-Food Services - Limited-Service Eating Places	00980-00000-00526
EL CAMINO REAL, II	1147 ARGENTINE BLVD KANSAS CITY, KS 66105	(913) 342-4334	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	01980-00000-00078
EL CHALATECO	1007 OSAGE AVE, KANSAS CITY, KS 66105		RESTAURANT		
EL CHALATECO	1005 OSAGE AVE KANSAS CITY, KS 66105	(816) 726-3167	RESTAURANT	Accommodation-Food Services - Limited-Service Eating Places	09980-00761
EL JACALITO	1150 ARGENTINE BLVD KANSAS CITY, KS 66105	(913) 281-3073	RESTAURANT	Accommodation-Food Services - Special Food Services	09980-01205
EL PADRINO SOCCER	848 CENTRAL AVE, KANSAS CITY, KS 66101		GROCERY STORE		
EL PIRATA	1031 CENTRAL AVE KANSAS CITY, KS 66102	(913) 621-1093	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	03980-00000-00003
EL POBIANO MARKET MINI MART STORE	331 S 10TH ST, KANSAS CITY, KS 66105		GROCERY STORE		
EL POBLANO MINI MARKET II	1003 OSAGE AVE, KANSAS CITY, KS 66105		GROCERY STORE		
EL POLLO GUASAVE	1600 CENTRAL AVE KANSAS CITY, KS 66102	(913) 621-1515	RESTAURANT	Accommodation-Food Services - Limited-Service Eating Places	05980-00000-01187
EL POLLO LOKO	6522 KAW DR, KANSAS CITY, KS		RESTAURANT		
EL POLLO REY	1101 KANSAS AVE KANSAS CITY, KS 66105		RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	03980-00000-00434
EL POLLO REY	901 KANSAS AVE, KANSAS CITY, KS		RESTAURANT		
EL POTRERO BAR & GRILL INC	4752 STATE AVE KANSAS CITY, KS 66102		RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	10980-00822
EL RABANITO	2203 METROPOLITAN AVE KANSAS CITY, KS 66106	(913) 432-5772	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	08980-00680
EL RANCHO	305 N 7TH ST, KANSAS CITY, KS		RESTAURANT		
EL SOL MINI MARKET	4300 LLOYD ST, KANSAS CITY, KS 66103		CONVENIENCE STORE		
EL TACO NAZO	624 KANSAS AVE, KANSAS CITY, KS 66105		GROCERY STORE		
EL TAQUITO INC	640 REYNOLDS, KANSAS CITY, KS 66101		FOOD PROCESSING		
EMERSON ELEMENTARY	1429 S 29TH, KANSAS CITY, KS 66106		SCHOOL		
ENDEAVOR HIGH SCHOOL	2540 JUNCTION RD, KANSAS CITY, KS 66106		SCHOOL		
EUGENE WARE ELEMENTARY	4820 OAKLAND, KANSAS CITY, KS 66102		SCHOOL		
EVERGREEN CHINESE RESTAURANT	7648 STATE AVE KANSAS CITY, KS 66112	(913) 334-7648	RESTAURANT	Accommodation-Food Services - Drinking Places-Alcohol	99980-00000-02828
EXCEL SERVICES, LLC D/B/A THE BURGER JOINT	3212 MERRIAM LN KANSAS CITY, KS 66106	(913) 766-9212	RESTAURANT	Accommodation-Food Services - Full-Service Restaurants	08980-00000-00118
EXECUTIVE KITCHEN	ONE SPORTING PARK, KANSAS CITY, KS 66111		RESTAURANT		
EXECUTIVE LOUNGE, LLC.	4929 STATE AVE KANSAS CITY, KS 66102	(913) 596-4810	RESTAURANT	Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00735
EXPERIENCE SPORTS BAR & GRILL	5934 LEAVENWORTH RD KANSAS CITY, KS 66104	(913) 788-2400	RESTAURANT	Accommodation-Food Services - Limited-Service Eating Places	05980-00000-00751
EXPRESS STOP #4	4431 SHAWNEE DR, KANSAS CITY, KS		GROCERY STORE		
FAIRFAX 66	2701 FAIRFAX TRFCWY, KANSAS CITY, KS 66115		CONVENIENCE STORE		
FAIRFAX LEARNING CENTER	3016 N 9TH ST, KANSAS CITY, KS 66102		SCHOOL		
FAMILY DOLLAR #1964	4927 STATE AVE, KANSAS CITY, KS		GROCERY STORE		
FAMILY DOLLAR #2163	8119 STATE AVE, KANSAS CITY, KS		GROCERY STORE		
FAMILY DOLLAR #2302	1274 MERRIAM LANE, KANSAS CITY, KS		GROCERY STORE		
FAMILY DOLLAR #2938	6000 LEAVENWORTH STE A, KANSAS CITY, KS		GROCERY STORE		
FAMILY DOLLAR #4521	1402 S 42ND ST, KANSAS CITY, KS		GROCERY STORE		
FAMILY DOLLAR #5323	3129 STATE AVE, KANSAS CITY, KS		GROCERY STORE		
FAMILY DOLLAR #5570	1225 QUINDARO BLVD, KANSAS CITY, KS		GROCERY STORE		
FAMILY DOLLAR #6153	1251 CENTRAL AVE, KANSAS CITY, KS		GROCERY STORE		
FAMILY DOLLAR # 8726	1200 N 7TH ST, KANSAS CITY, KS		GROCERY STORE		

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FAMILY DOLLAR #9378	520 COUNTY LINE ROAD, KANSAS CITY, KS			GROCERY STORE				
FAMOUS DAVE'S	1320 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 334-8646		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	08980-00720
FARMSTEAD NUTS & TREATS	2920 MERRIAM LN, KANSAS CITY, KS 66106			FOOD PROCESSING				
FAST FOOD ZONE	2425 METROPOLITAN AVE KANSAS CITY, KS 66106	(913) 393-2475		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	10980-00608
FAST FREDDIES	1806 N 18TH ST KANSAS CITY, KS 66104	(913) 371-4124		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-01436
FAST N FRIENDLY CONVENIENCE	1710 MINNESOTA AVE, KANSAS CITY, KS 66102			CONVENIENCE STORE				
FAST SNACK PACK	914 S 55TH ST, KANSAS CITY, KS 66106			CONVENIENCE STORE				
FAST STOP #12	945 S 55TH ST, KANSAS CITY, KS 66106			CONVENIENCE STORE				
FAST TRIP	4039 METROPOLITAN AVE, KANSAS CITY, KS 66103			CONVENIENCE STORE				
FAT MATT'S VORTEX	411 N 6TH ST, KANSAS CITY, KS 66101			RESTAURANT				
FEED BAG	1800 VILLAGE WEST PARKWAY, STE. M135, KANSAS CITY, KS			RESTAURANT				
FELITZA'S INC.	402 N 5TH ST KANSAS CITY, KS 66101	(913) 281-1569		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00688
FIELD KITCHEN	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
FIGUEROA'S BAKERY	1345 S 26TH ST, KANSAS CITY, KS			GROCERY STORE				
FILL N' SHOP INC	756 COUNTY LINE RD, KANSAS CITY, KS 66103			CONVENIENCE STORE				
FIRE BURGER	2425 METROPOLITAN AVE KANSAS CITY, KS 66106	(816) 668-8555		RESTAURANT			Exempt - Exempt	09980-01108
FIVE GUYS BURGERS AND FRIES	1803 VILLAGE WEST PKWY M-135 KANSAS CITY, KS 66111	(913) 334-4700		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	09980-00885
FIVE GUYS BURGERS AND FRIES	3930 RAINBOW BLVD, KANSAS CITY, KS			GROCERY STORE				
FL SCHLAGLE HIGH SCHOOL	2214 N 59TH, KANSAS CITY, KS 66103			SCHOOL				
FLAME THROWERS B B Q	440 STANLEY RD KANSAS CITY, KS 66115	(913) 621-2211		RESTAURANT			Accommodation-Food Services - Drinking Places-Alcohol	99980-00000-05132
FOE AERIE 87	1969 N 63RD DR, KANSAS CITY, KS 66102			RESTAURANT				
FOOD EXPRESS #2	1818 QUINDARO BLVD, KANSAS CITY, KS 66104			CONVENIENCE STORE				
FOOD FOR LIFE SUPREME DINER	1608 N 13TH ST KANSAS CITY, KS 66102	(913) -913		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-04520
FRANCES WILLARD ELEMENTARY	3400 ORVILLE, KANSAS CITY, KS 66102			SCHOOL				
FRANK RUSTON ELEMENTARY	2605 W 43RD, KANSAS CITY, KS 66103			SCHOOL				
FRANKIE D'S INC.	6411 KANSAS AVE KANSAS CITY, KS 66111	(913) 287-9134		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-00738
FRATERNAL ORDER OF EAGLES #87	1969 N 63RD DR KANSAS CITY, KS 66102	(913) 334-4995		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01283
FRIED RICE KING	2202 N 7TH TRFY KANSAS CITY, KS 66101			RESTAURANT				
FRIED RICE KING	2207 N 7TH TRFY KANSAS CITY, KS 66101			RESTAURANT				
FRITZ'S UNION STATION	250 N 18TH ST KANSAS CITY, KS 66102	(913) 281-2777		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01420
FRONTERAS SUPER MARKET/RESTAURANT	761 CENTRAL AVE, KANSAS CITY, KS 66101			GROCERY STORE				
FRONTIER STEAK HOUSE	9338 STATE AVE KANSAS CITY, KS 66112	(913) 788-9159		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01284
G & S CONVENIENCE STORE	8537 STATE AVE, KANSAS CITY, KS 66112			CONVENIENCE STORE				
GALLO DE ORO	970 KANSAS AVENUE, KANSAS CITY, KS 66105			RESTAURANT				
GARRETT'S	6505 NIEMAN RD, KANSAS CITY, KS			RESTAURANT				
GASMAST USA INC #59	10303 LEAVENWORTH RD, KANSAS CITY 66101			CONVENIENCE STORE				
GATES & SONS BARBEQUE	1026 STATE AVE KANSAS CITY, KS 66102	(913) 621-1134		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01078
GATEWAY PLAZA TOWNHOUSES	1430 N 5TH STREET, KANSAS CITY, KS			RESTAURANT				
GCH ENTERPRISES, INC. DAGWOODS CAFE	1117 SOUTHWEST BLVD KANSAS CITY, KS 66103	(913) 677-0747		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	09980-00616
GNC #8181	1803 VILLAGE WEST PKWY, KANSAS CITY, KS			GROCERY STORE				
GO CHICKEN GO	59 N 7TH TRWY KANSAS CITY, KS 66101	(913) 342-4616		RESTAURANT			Arts-Entertainment-Recreation - Amusement-Recreation Indus	99980-00000-01079
GO CHICKEN GO	8017 STATE AVE KANSAS CITY, KS 66112	(913) 299-8606		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-04763
GO CHICKEN GO, INC.	4111 SHAWNEE DR KANSAS CITY, KS 66106	(913) 722-9494		RESTAURANT			Accommodation-Food Services - Drinking Places-Alcohol	00980-00000-00746
GOMEZ CONCESSIONS	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
GOMEZ CONCESSIONS	1800 VILLAGE WEST PKWY, KANSAS CITY, KS			RESTAURANT				
GOODCENTS	4100 RAINBOW BLVD, KANSAS CITY, KS 66103			RESTAURANT				
GOSSIP INN	2418 PARK DR KANSAS CITY, KS 66102	(913) 499-8500		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	09980-01148
GRAB-N-GO #1	6828 KAW DR, KANSAS CITY, KS			GROCERY STORE				
GRAND SLAM CONCESSIONS	1800 VILLAGE WEST PARKWAY, KANSAS CITY, KS			RESTAURANT				
GRANITE CITY FOOD & BREWERY	1701 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 334-2255		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	06980-00000-00010
GRANNY'S CHICKEN RANCH	1340 VILLAGE WEST PARKWAY, KANSAS CITY, KS			RESTAURANT				
GRANT ELEMENTARY	1510 NORTH FOURTH, KANSAS CITY, 66101			SCHOOL				
GRANT'S FAMILY RESTAURANT	8917 LEAVENWORTH RD KANSAS CITY, KS 66109	(913) 788-2000		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00713
GREAT WOLF LODGE OF KANSAS CITY	10401 CABELA DR KANSAS CITY, KS 66111	(913) 299-7001		RESTAURANT			Accommodation-Food Services - Special Food Services	03980-00000-00593
GS FOODS	1 SHAWNEE AVE, KANSAS CITY, KS 66105			FOOD PROCESSING				
GUERRA'S PLACE	315 S 10TH ST KANSAS CITY, KS 66102	(913) 321-2895		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-02144
HAMBURGUESAS LOS COMPAS	904 N 18TH ST KANSAS CITY, KS 66102	(913) 233-0293		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00139
HAPPY FOODS NORTH	5420 LEAVENWORTH RD, KANSAS CITY, KS 66104			GROCERY STORE				
HAPPY FOODS WEST	6700 KAW DR, KANSAS CITY, KS 66111			GROCERY STORE				
HARDEES #1500544	8021 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
HARRY & DAVID #843	1843 VILLAGE WEST PKWY, C109, KANSAS CITY, KS			GROCERY STORE				
HATSKI CATERING	8050 LEAVENWORTH RD KANSAS CITY, KS 66109	(913) 299-3663		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	05980-00000-01149
HAYWARD'S PIT BBQ & BAR INC	400 SPEEDWAY BLVD KANSAS CITY, KS 66111	(913) 451-8080		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	01980-00000-00346
HAZEL GROVE EAST ELEMENTARY SCHOOL	2401 N 67TH, KANSAS CITY, KS 66104			SCHOOL				
HEN HOUSE #27	8120 PARALLEL PKWY, KANSAS CITY, KS 66112			GROCERY STORE				
HERRERA'S LONCHERIA	765 CENTRAL AVE KANSAS CITY, KS 66101	(913) 321-4246		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	05980-00000-00544
HERRERA'S SUPERMARKET	761 CENTRAL AVE, KANSAS CITY, KS 66101			GROCERY STORE				
HICKORY LOG BAR-B-Q	5047 WELBORN LN KANSAS CITY, KS 66104	() 287-9560		RESTAURANT			Retail Trade - Nonstore Retailers	99980-00000-01353
HIDE OUT CLUB	1410 CENTRAL, KANSAS CITY, KS			RESTAURANT				
HILTON GARDEN INN	520 MINNESOTA AVE KANSAS CITY, KS 66101	(913) 342-7900		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	02980-00000-00689
HINCKLEY SPRINGS	2545 S FERREE, KANSAS CITY, KS 66103			FOOD PROCESSING				
HITCHING POST TAVERN INC, THE	1328 MERRIAM LN KANSAS CITY, KS 66103	(913) 677-3949		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-00831
HOG WILD & PIG CRAZY	6519 PARALLEL AVE, KANSAS CITY, KS 66111			RESTAURANT				
HOG WILD & PIG CRAZY	6515 PARALLEL PKWY KANSAS CITY, KS 66102	(913) 788-4700		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	07980-00000-00174
HOLLYWOOD CASINO @ KANSAS SPEEDWAY EPIC BUFFETT	777 HOLLYWOOD CASINO BLVD, KANSAS CITY, KS 66111			RESTAURANT				

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HOLLYWOOD CASINO @ KANSAS SPEEDWAY	777 HOLLYWOOD CASINO BLVD, KANSAS CITY, KS 66111			RESTAURANT				
HOLLYWOOD CASINO @ KANSAS SPEEDWAYVIP	777 HOLLYWOOD CASINO BLVD, KANSAS CITY, KS 66111			RESTAURANT				
HOLLYWOOD CASINO BAKERY	777 HOLLYWOOD CASINO BLVD, KANSAS CITY, KS 66111			RESTAURANT				
HOLLYWOOD CASINO BARS/MAIN KITCHEN/WAREHOUSE	777 HOLLYWOOD CASINO BLVD, KANSAS CITY, KS 66111			RESTAURANT				
HOLY NAME SCHOOL	1007 SW BOULEVARD, KANSAS CITY, KS			RESTAURANT				
HOME TOWN MARKET	2110 W. 18TH ST, KANSAS CITY, KS 66104			RESTAURANT				
HOME TOWN MARKET MU 6239	1611 N 38TH ST, KANSAS CITY, KS			RESTAURANT				
HOOTERS OF KANSAS SPEEDWAY	1712 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 788-4668		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	05980-00000-00799
HOUSE OF WINGS	6607 PARALLEL PKWY KANSAS CITY, KS 66102	(913) 328-0020		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	09980-01226
IHOP MIDWEST #2023	1919 PRAIRIE CROSSING KANSAS CITY, KS 66111	(913) 788-4468		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	05980-00000-00730
IN & OUT	5531 LEAVENWORTH, KANSAS CITY, KS 66104			CONVENIENCE STORE				
IN & OUT 66	2100 PARK DR, KANSAS CITY, KS 66102			CONVENIENCE STORE				
IN & OUT MARKET	3051b N 51ST, KANSAS CITY, KS			GROCERY STORE				
INDIOS CARBONITOS MU 1514	347 N 8TH, KANSAS CITY, KS			RESTAURANT				
INNER CITY OIL #540	540 S 10TH ST, KANSAS CITY, KS 66105			CONVENIENCE STORE				
INTERNATIONAL FOOD PRODUCTS	6721 GRIFFIN RD, KANSAS CITY, KS 66111			FOOD PROCESSING				
INTERNET CAFE & BOOK STORE	1659 WASHINGTON BLVD KANSAS CITY, KS 66102	(913) 233-2223		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	09980-00395
ITALIAN DELIGHT	4601 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
ITALIAN DELIGHT	8045 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
ITALIAN DELIGHT	8145 STATE AVE KANSAS CITY, KS 66112	(913) 287-4323		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-04416
J C HARMON HIGH SCHOOL	2400 STEELE RD, KANSAS CITY, KS 66106			SCHOOL				
JACK IN THE BOX #6200	211 S 18TH ST KANSAS CITY, KS 66102	(913) 371-0911		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00795
JACK IN THE BOX #6202	10630 PARALLEL PKWY, KANSAS CITY, KS 66109			RESTAURANT				
JALISCO'S	1411 S 26TH ST KANSAS CITY, KS 66106	(913) 831-9001		RESTAURANT			Accommodation-Food Services - Drinking Places-Alcohol	99980-00000-01470
JALISCO'S RESTAURANT	5000 STATE AVE KANSAS CITY, KS 66102	(913) 287-9268		RESTAURANT			Accommodation-Food Services - Drinking Places (Alcohol)	99980-00000-01173
JAMES LEMONADE RESTAURANT	2110 N 18TH ST KANSAS CITY, KS 66104	(913) 371-7458		RESTAURANT			Accommodation-Food Services - Special Food Services	10980-00230
JAVA LAND	1601 VILLAGE WEST PKWY, KANSAS CITY, KS 66111			RESTAURANT				
JAY WALE BAKERY & BISTRO	503 N 6TH, KANSAS CITY, KS 66101			RESTAURANT				
JAYWALKERS	3916 RAINBOW BLVD KANSAS CITY, KS 66103	(913) 671-7464		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	06980-00000-00645
JAZZ A LOUISIANA KITCHEN	1859 VILLAGE WEST PARKWAY #102, KANSAS CITY, KS 66111			RESTAURANT				
JERRY'S SPORTS PUB, LLC.	8048 LEAVENWORTH RD KANSAS CITY, KS 66109	(913) 788-3596		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	09980-00919
JOE MUGGS	1811 VILLAGE WEST PKWY STE O-135 KANSAS CITY, KS 66111	(913) 299-0204		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	06980-00000-00376
JOE'S CORNER CONVENIENCE STORE	3002 W 47TH AVE, KANSAS CITY, KS 66103			GROCERY STORE				
JOHN F KENNEDY ELEMENTARY	2600 N 72ND, KANSAS CITY, KS 66109			SCHOOL				
JOHN FISKE ELEMENTARY	625 S VALLEY, KANSAS CITY, KS 66105			SCHOOL				
JOHNNIE'S ON 7TH	55 S 7TH ST, KANSAS CITY, KS 66101			RESTAURANT				
JOHNNIES WEST, LLC	8016 LEAVENWORTH RD KANSAS CITY, KS 66109	(816) 797-2711		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	08980-00721
JOHNNY C'S DELI & PASTA #2	1113 N 5TH ST KANSAS CITY, KS 66101	(913) 281-3663		RESTAURANT			Accommodation-Food Services - Special Food Services	00980-00000-00121
JOHNNY JUKE'S TAKE-OUT	1410 MINNESOTA AVE, KANSAS CITY, KS 66102			RESTAURANT				
JOY ORIENTAL FOOD	930 MINNESOTA AVE, KANSAS CITY, KS 66101			GROCERY STORE				
JUDI'S BAKERY CAFÉ	11006 PARALLEL, KANSAS CITY, KS 66109			RESTAURANT				
JUNCTION ELEMENTARY	2570 S 42ND ST, KANSAS CITY, KS 66106			SCHOOL				
JUNIPER GARDENS SNS	1980 N 2ND STREET, KANSAS CITY, KS			RESTAURANT				
K U COURTYARD CAFE	3901 RAINBOW BLVD KANSAS CITY, KS 66160	(913) 268-8055		RESTAURANT			Accommodation-Food Services - Drinking Places-Alcohol	99980-00000-06053
K.C. CIVIC CENTER, LLC DBA BERMUDAS	6220 KANSAS AVE KANSAS CITY, KS 66111	(816) 918-4520		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	09980-00126
KADI QUICK STOP	6865 STATE AVE, KANSAS CITY, KS 66102			GROCERY STORE				
KANSAS CITY CATERING INC	3018 S 44TH ST KANSAS CITY, KS 66106	(913) 831-0764		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-01699
KANSAS CITY LOYAL ORDER OF MOOSE LODGE #1999	6621 TURNER DR PO BOX 11095, KANSAS CITY, KS 66111			RESTAURANT				
KANSAS STATE SCHOOL FOR THE BLIND	1100 STATE, KANSAS CITY, KS 66102			SCHOOL				
KANSAS STATE TMG, LLC D/B/A TED'S MONTANA GRILL	1713 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 788-4567		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00788
KC BOWL	8201 STATE AVE KANSAS CITY, KS 66112	(913) 638-1817		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00675
KC BURGER	1101 KANSAS AVE, KANSAS CITY, KS 66105			RESTAURANT				
KC DISCOUNT STORE	929 MINNESOTA, KANSAS CITY, KS			GROCERY STORE				
KC GAS MART	2859 STATE AVE, KANSAS CITY, KS 66102			CONVENIENCE STORE				
KC POPPERS	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
KC QUICK PICK	400 N 10TH ST, KANSAS CITY, KS 66102			GROCERY STORE				
KCK EARLY CHILDHOOD CENTER	1708 N 55TH ST, KANSAS CITY, KS 66103			SCHOOL				
KCKCC-TEC CAFETERIA	2220 N 59TH ST, KANSAS CITY, KS 66104			SCHOOL				
KDKAKES	6609 PARALLEL PKWY KANSAS CITY, KS 66102	(913) 334-5546		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00332
KELLOGG'S SNACKS	801 SUNSHINE RD, KANSAS CITY, KS 66115			FOOD PROCESSING				
KETTLE STOP (THE)	1800 VILLAGE WEST PKWY, KANSAS CITY, KS			RESTAURANT				
KFC	3522 STATE AVE KANSAS CITY, KS 66102	(913) 321-1800		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00160
KFC/TACO BELL	635 S 7TH TRWY KANSAS CITY, KS 66105	(913) 281-4109		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00161
KFC	7517 STATE AVE KANSAS CITY, KS 66112	(913) 334-3200		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	04980-00000-00162
KFC/TACO BELL	4401 SHAWNEE DR KANSAS CITY, KS 66106	(913) 236-7590		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	04980-00000-00163
KFC	4100 RAINBOW BLVD KANSAS CITY, KS 66103	(913) 403-0932		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00195
KHAN PETROLEUM CORP	1233 MERRIAM LN, KANSAS CITY, KS 66103			CONVENIENCE STORE				
KIDDIE KOLLEGE PRIMARY SCHOOL	2400 N. MAXINE WILLIAMS DR, KANSAS CITY, KS 66101			SCHOOL				
KLO HTOO ASIAN MARKET	3218 STRONG AVE, KANSAS CITY, KS			GROCERY STORE				
K-MART #4215	7836 STATE AVE, KANSAS CITY, KS			GROCERY STORE				
KRISPY KRUNCHY CHICKEN #2	748 WASHINGTON BLVD, KANSAS CITY, KS 66101			RESTAURANT				
KRIZMAN'S HOUSE OF SAUSAGE	424 N 6TH, KANSAS CITY, KS			GROCERY STORE				
KRM, INC. D/B/A MEXICO LINDO	719 KANSAS AVE KANSAS CITY, KS 66105	(913) 722-9200		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	10980-00198
KU MED STORE-KC	3901 RAINBOW BLVD G014 ORR-MAJOR. KANSAS CITY, KS 66160			CONVENIENCE STORE				
KVC BEHAVIORAL HEALTH CARE	4300 BRENNER DR, KANSAS CITY, KS 66104			SCHOOL				

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LA CHIQUITA MARKET	1721 MINNESOTA AVE, KANSAS CITY, KS 66101			GROCERY STORE				
LA ESTRELLA	1501 SW BOULEVARD, KANSAS CITY, KS 66103			GROCERY STORE				
LA GUADALUPANA	939 CENTRAL AVE, KANSAS CITY, KS 66101			GROCERY STORE				
LA GUADALUPANA	941 CENTRAL AVE, KANSAS CITY, KS			RESTAURANT				
LA NENA TORTILLERIA & ROSTICERIA	1200 MINNESOTA AVE, KANSAS CITY, KS 66102			RESTAURANT				
LA PARRILLA RESTAURANT	1801 STATE AVE KANSAS CITY, KS 66102	(913) 281-7789		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00456
LA TIENDITA MARKET	350 N 7TH ST, KANSAS CITY, KS 66101			GROCERY STORE				
LAKECO, LLC/LAKESIDE SPEEDWAY	5615 WOLCOTT DR KANSAS CITY, KS 66109	(913) 299-2040		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-04158
LAS BANDERAS, LLC DBA GALLO DE ORO	970 KANSAS AVE KANSAS CITY, KS 66105	(913) 371-0201		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	08980-00000-00506
LAS GORDITAS #2	844 CENTRAL AVE KANSAS CITY, KS 66101	(913) 371-0018		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	06980-00000-00771
LAS PALMAS RESTAURANTE	825 MINNESOTA AVE, KANSAS CITY, KS 66101			RESTAURANT				
LAS TIAS MEXICAN RESTAURANT	2425 METROPOLITAN, KANSAS CITY			RESTAURANT				
LAS TORTUGAS	265 N 7TH ST, KANSAS CITY, KS 66101			RESTAURANT				
LAS TORTUGAS MEXICAN RESTAURANT	708 SIMPSON AVE KANSAS CITY, KS 66101	(913) 281-0084		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00204
LAURA'S BAKERY & GRILLE, LLC (RESTAURANT)	1304 CENTRAL AVE KANSAS CITY, KS 66102	(913) 321-1511		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	01980-00000-00323
LAURA'S PANADERIA & TORTILLERIA	1310 CENTRAL AVE, KANSAS CITY, KS 66102			RESTAURANT				
LAURA'S TACOS & TORTAS (MU 2038)	1304 CENTRAL AVE, KANSAS CITY, KS			RESTAURANT				
LESLIE'S TAQUERIA	1251 KANSAS AVE KANSAS CITY, KS 66105	(913) 281-4125		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	09980-00219
LIBERTY FRUIT CO INC	1247 ARGENTINE BLVD, KANSAS CITY, KS 66102			FOOD PROCESSING				
LIBERTY FRUIT CO INC	1251 ARGENTINE BLVD, KANSAS CITY, KS 66105			FOOD PROCESSING				
LINDBERGH ELEMENTARY	641 NORTH 57TH, KANSAS CITY, KS 66102			SCHOOL				
LIPARI BROTHERS THRIFTWAY	800 KANSAS AVE, KANSAS CITY, KS 66105			GROCERY STORE				
LISSA'S MINI MARKET	1253 KANSAS AVE, KANSAS CITY, KS			GROCERY STORE				
LITTLE CAESARS	151 S 18TH ST UNIT K, KANSAS CITY, KS 66102			RESTAURANT				
LIVESTRONG - BUD TERRACE	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
LOGAN'S ROADHOUSE	10780 PARALLEL PKWY, KANSAS CITY, KS 66109			RESTAURANT				
LON LANE'S INSPIRED OCCASIONS	6306 MORNINGSIDE DR KANSAS CITY, MO 64113	(816) 444-8372		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-03967
LONE STAR STEAKHOUSE & SALOON	1501 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 334-9995		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	06980-00000-00835
LONGHORN STEAKHOUSE OF SPEEDWAY (#5210)	1708 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 788-4400		RESTAURANT			Accommodation-Food Services - Drinking Places (Alcohol)	04980-00000-00084
LOS AMIGOS	2610 STATE AVE KANSAS CITY, KS 66102	(913) 281-4547		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-03266
LOS CABOS	1867 VILLAGE WEST PKWY D-105 KANSAS CITY, KS 66111	(913) 948-8310		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	09980-00490
LOS PARIENTES	309 N 7TH STREET, KANSAS CITY, KS			GROCERY STORE				
LOS PRIMOS BAR CLUB & GRILL, INC.	4752 STATE AVE KANSAS CITY, KS 66102	(913) 710-0986		RESTAURANT			Exempt - Exempt	08980-00686
LOU LOU'S LLC	1315 FAIRFAX TRFY KANSAS CITY, KS 66115	(913) -57-2121		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00195
LOUISIANA SMOKE BAR B QUE	3412 LEAVENWORTH RD KANSAS CITY, KS 66104	(913) 262-1143		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	02980-00000-00210
LOWE'S HOME CENTERS INC #1830	6920 STATE AVE, KANSAS CITY, KS			GROCERY STORE				
LOWELL LAMB CHILDHOOD CENTER	1030 ORVILLE AVE, KANSAS CITY, KS			RESTAURANT				
LOYAL ORDER OF MOOSE #1999	6621 TURNER DR KANSAS CITY, KS 66111	() 334-4900		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-02202
L'S SERVICES, LLC DBA BLUE DEVIL DELI	7250 STATE AVE KANSAS CITY, KS 66112	(913) 288-7608		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	09980-00902
LUCKY CHINESE BUFFET	7836 STATE AVE KANSAS CITY, KS 66112	(913) 299-5400		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	00980-00000-00154
LUCKY CHINESE BUFFET	7818 STATE AVENUE, KANSAS CITY, KS 66112			RESTAURANT			Apartment Complex	
LUCKY CHOPSTICKS	722 MINNESOTA AVE KANSAS CITY, KS 66101	(913) 281-3071		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	06980-00000-00398
LUTFI'S FRIED FISH & CHICKEN	4741 PARALLEL PKWY KANSAS CITY, KS 66104	(91) 287-5157		RESTAURANT			Accommodation-Food Services - Drinking Places (Alcohol)	08980-00000-00336
M&M STATE AVENUE (ATTN: NAVEED BHATTI)	8537 STATE AVE, KANSAS CITY, KS 66112			GROCERY STORE				
M E PEARSON SCHOOL	310 NORTH 11TH, KANSAS CITY, KS 66101			SCHOOL				
MAD JACK'S FRESH FISH	1318 STATE AVE, KANSAS CITY KS 66102			RESTAURANT				
MAIN KITCHEN	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
MAIN PRODUCTION KITCHEN	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT				
MAIS ASAIN RESRAURANT ON WHEELS	2925 32ND STREET, KANSAS CITY, KS			RESTAURANT				
MAMA'S HOUSE	4747 PARALLEL PKWY KANSAS CITY, KS 66104	(913) 287-6010		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00944
MAMA SOCO RESTAURANT	1304 CENTRAL AVE, KANSAS CITY, KS			RESTAURANT				
MARIACHI'S	7516 STATE AVE KANSAS CITY, KS 66112	(913) 334-9069		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00090
MARIA'S KITCHEN	6255 KAW DR, KANSAS CITY, KS 66111			RESTAURANT				
MARK TWAIN	813 BARNETT, KANSAS CITY, KS			RESTAURANT				
MARK TWAIN ELEMENTARY	2300 MINNESOTA, KANSAS CITY, KS			RESTAURANT				
MARTITA'S CLUB	403 N 5TH ST KANSAS CITY, KS 66101			RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	09980-00815
MARTITA'S PLACE	4960 STATE AVE, KANSAS CITY, KS 6102			RESTAURANT				
MARY'S DELICATESSEN	11554 ASH ST, KANSAS CITY, KS			RESTAURANT				
MATTHEWS KU MED BOOKSTORE	3901 RAINBOW BLVD, KANSAS CITY, KS 66103			RESTAURANT				
MAUI WOWI HAWAIIAN - MU5287	1929 N 83RD ST, KANSAS CITY, KS			GROCERY STORE				
MAX'S KETTLE CORN	400 SPEEDWAY BLVD KANSAS CITY, KS 66111	(913) 287-1177		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	02980-00000-00434
MAYAS PHONE	5411 LEAVENWORTH RD, KANSAS CITY, KS 66104			CONVENIENCE STORE				
MCCURRYS GROCERY	1936 N 3RD, KANSAS CITY, KS 66101			CONVENIENCE STORE				
MCDONALDS	10555 PARALLEL PKWY KANSAS CITY, KS 66109	(913) 299-9600		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	05980-00000-01001
MCDONALDS	7530 STATE AVE KANSAS CITY, KS 66112	(913) 334-1400		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-01232
MCDONALDS	812 MINNESOTA AVE KANSAS CITY, KS 66101	(913) 321-0542		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01914
MCDONALDS	605 S 7TH ST KANSAS CITY, KS 66105	() 321-9225		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-01915
MCDONALD'S	3725 STATE AVE, KANSAS CITY, KS 66102			RESTAURANT				
MCDONALD'S	4101 KANSAS AVE KANSAS CITY, KS 66106	(913) 281-1312		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	03980-00000-00953
MCDONALD'S #6894	605 S 7TH ST, KANSAS CITY, KS 66105			RESTAURANT				
MCDONALD'S OF BONNER SPRINGS	606 S 130TH ST, BONNER SPRINGS, KS 66012			RESTAURANT				
MCDONALDS RESTAURANT	4215 RAINBOW BLVD KANSAS CITY, KS 66103	(913) 677-3220		RESTAURANT			Accommodation-Food Services - Special Food Services	99980-00000-04519
MCDONALD'S RESTAURANT	4427 SHAWNEE DR KANSAS CITY, KS 66106	(913) 262-5223		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	02980-00000-00172
McKINLEY ELEMENTARY SCHOOL	611 N 14TH ST, KANSAS CITY, KS 66102			SCHOOL				
MEDINA ENTERPRISES, LLC. D/B/A MARTITA'S PLACE	4960 STATE AVE KANSAS CITY, KS 66102			RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	10980-00559

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MEMA'S BLUE DEVIL DELI	7250 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
MEMAS OLD FASHIONED BAKERY	1829 VILLAGE WEST PKWY STE T131, KANSAS CITY, KS 66111			FOOD PROCESSING				
METRO AUTO SERVICE	4116 METROPOLITAN AVE, KANSAS CITY, KS 66106			CONVENIENCE STORE				
METRO FOOD & GAS	2101 METROPOLITAN AVE, KANSAS CITY, KS 66106			CONVENIENCE STORE				
METROPOLITAN LUTHERAN MINISTRY	722 REYNOLDS, KANSAS CITY, KS			RESTAURANT				
MEXICO LINDO #3	719 KANSAS AVE, KANSAS CITY, KS			RESTAURANT				
MI COSINO MEXICO	3101 S 51ST, KANSAS CITY, KS 66106			RESTAURANT				
MICVIC ENTERPRISES LLC dba SCOOTERS COFFEE HOUSE	7250 STATE AVE KANSAS CITY, KS 66112	(913) 288-7506		RESTAURANT			Accommodation-Food Services - Drinking Places-Alcohol	09980-00285
MID AMERICA WAFFLES INC DBA WAFFLE HOUSE #1286	4500 KANSAS AVE KANSAS CITY, KS 66106	(913) 371-8584		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00108
MID WEST FUEL #4 LLC	300 N 78TH ST, KANSAS CITY, KS 66112			CONVENIENCE STORE				
MIDLAND TRAIL ELEMENTARY	3101 S 51ST, KANSAS CITY, KS 66106			SCHOOL				
MIDWEST DISTRIBUTORS CO INC	6501 KANSAS AVE, KANSAS CITY, KS 66111			FOOD PROCESSING				
MODA MANSION EL PUEBLITO	508 KANSAS AVE KANSAS CITY, KS 66105	(913) 671-1826		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00864
MOE'S MEATS LLC (MU 1773)	731 N 75TH TERRACE, KANSAS CITY, KS			RESTAURANT				
MONARCH GRILL	1800 WEST VILLAGE PKWY, KANSAS CITY, KS			RESTAURANT				
MONCHIES, INC.	1350 S 26TH ST KANSAS CITY, KS 66106	(913) 677-4454		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	05980-00000-01127
MORSE ELEMENTARY	912 S BALTIMORE, KANSAS CITY, KS 66105			SCHOOL				
MR GOODCENTS	13021 KANSAS AVE, BONNER SPRINGS, KS 66012			RESTAURANT				
MR GOODCENTS SUBS & PASTA #1031	4100 RAINBOW BLVD, KANSAS CITY, KS 66103			RESTAURANT				
MR. GOODCENTS	7933 STATE AVE KANSAS CITY, KS 66112	(913) 788-3800		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-04693
MR. J's DELI DRIVE IN	5512 LEAVENWORTH RD KANSAS CITY, KS 66104	(913) 596-1448		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	08980-00968
MS KITTY'S INC D/B/A DOUBLE T'S ROADHOUSE	1421 MERRIAM LN KANSAS CITY, KS 66103	(913) 432-5555		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01910
MS PETROLEUM	10421 KAW DR, EDWARDSVILLE, KS 66111			CONVENIENCE STORE				
MS. R'S CAFE	720 QUINDARO BLVD KANSAS CITY, KS 66101	(913) 371-7611		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-01570
MT, OLIVE MISSIONARY BAPTIST CHURCH	1226 ARMSTRONG AVE, KANSAS CITY, KS			RESTAURANT				
NAISH SCOUT RESERVATION	1100 MARTINEK, KANSAS CITY, KS			RESTAURANT				
NANCY ELIZONDO MU6238	356 N 10TH STREET, KANSAS CITY, KS			RESTAURANT				
NEFERTITI RESTAURANT & HALL	1314 QUINDARO BLVD KANSAS CITY, KS 66104	(913) 321-6677		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-04427
NEREIDAS CLUB	48 KANSAS AVENUE, KANSAS CITY, KS 66105			RESTAURANT				
NEREIDAS CO.	46 KANSAS AVE KANSAS CITY, KS 66105	(933) 271-3996		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-00699
NEW CHINA	3726 STATE AVE KANSAS CITY, KS 66102	(913) 342-1218		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	09980-00039
NEW FRIED RICE KING	2202 N 7TH TRFY KANSAS CITY, KS 66101	(913) 281-2828		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00715
NEW FRIED RICE KING	748A WASHINGTON BLVD, KANSAS CITY, KS			RESTAURANT				
NEXEO SOLUTIONS LLC	5420 SPEAKER RD, KANSAS CITY, KS 66106			FOOD PROCESSING				
NICE FOOD	7557 STATE AVE KANSAS CITY, KS 66112	(913) 328-1656		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00036
NICK-N-WILLY'S PIZZA	1829 VILLAGE WEST PKWY STE. T-129 KANSAS CITY, KS 66111	(913) 328-1600		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00585
NICK'S ITALIAN PIZZA	714 MINNESOTA AVE KANSAS CITY, KS 66101	() 321-1610		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-04282
NINFA'S, INC.	964 KANSAS AVE KANSAS CITY, KS 66105	(913) 621-1743		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-02535
NOBLE PRENTIS ELEMENTARY	2337 S 14TH, KANSAS CITY, KS 66103			SCHOOL				
NOLA'S SOUL FOOD	1805 N 10TH ST KANSAS CITY, KS 66104	(816) 509-3392		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	03980-00000-00001
NORTHEAST OPTIMIST CLUB	2515 N 27TH ST KANSAS CITY, KS 66104			RESTAURANT			Accommodation-Food Services - Special Food Services	99980-00000-00663
NORTHWEST JUNIOR HIGH	2400 N 18TH, KANSAS CITY, KS 66104			SCHOOL				
NUTRI-SALUD	1125 CENTRAL AVE, KANSAS CITY, KS 66102			RESTAURANT				
NUTRITION WRKS	133 OAK ST, BONNER SPRINGS, KS 66012			RESTAURANT				
OAK GROVE ELEMENTARY	5340 OAK GROVE RD, KANSAS CITY, KS 66106			SCHOOL				
OAKRIDGE MISSIONARY BAPTIST CHURCH	9301 PARALLEL PKWY, KANSAS CITY, KS			RESTAURANT				
OKLAHOMA JOE'S BBQ & CATERING	3002 W 47TH AVE KANSAS CITY, KS 66103	(913) 722-3366		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-04649
OLD SHAWNEE PIZZA & ITALIAN KITCHEN	2422 S 34TH ST KANSAS CITY, KS 66106	(913) 677-1844		RESTAURANT			Accommodation-Food Services - Drinking Places-Alcohol	99980-00000-01476
OLIVE EVENTS	11620 LEAVENWORTH RD KANSAS CITY, KS 66109	(913) 721-3399		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	09980-00977
OLIVE GARDEN #1795	10670 PARALLEL PKWY, KANSAS CITY, KS 66109			RESTAURANT				
OLIVIA'S OVEN	12325 BELLERIVE DR, KANSAS CITY, KS 66109			FOOD PROCESSING				
OLYMPIC BURGER	3216 MERRIAM LN, KANSAS CITY, KS 66106			RESTAURANT				
ON THE GO TRAVEL CENTER	9134 WOODEND AVE, EDWARDSVILLE, KS 66111			CONVENIENCE STORE				
ONE STOP N SHOP	901 MINNESOTA AVE, KANSAS CITY, KS 66101			CONVENIENCE STORE				
OPEN DOOR MINISTRIES	3033 N 103RD TERR, KANSAS CITY, KS 66109			SCHOOL				
ORIGINAL BREAD INC. DBA PANERA BREAD	1811 VILLAGE WEST PKWY O-125 KANSAS CITY, KS 66111	(913) 334-3800		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	06980-00000-00786
ORIGINAL CORNER MARKET	81 N MILL ST, KANSAS CITY, KS 66101			GROCERY STORE				
ORIGINAL JUAN SPECIALTY FOODS INC	111 SOUTHWEST BLVD, KANSAS CITY, KS 66103			FOOD PROCESSING				
OROWEAT BAKERY	4435 SHAWNEE DR, KANSAS CITY, KS 66106			GROCERY STORE				
OSUNA BAKERY, INC	749 CENTRAL AVE, KANSAS CITY, KS			GROCERY STORE				
OUR LADY OF UNITY SCHOOL	2646 S 34TH, KANSAS CITY, KS 66106			SCHOOL				
OUTBACK STEAKHOUSE #1717	1851 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 334-2147		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	06980-00000-00009
PACES	1620 S 37TH STREET, KANSAS CITY, KS			RESTAURANT				
PAINTED HILLS GOLF COURSE	71041 PARALLEL PKWY, KANSAS CITY, KS 66112			RESTAURANT				
PALACE EXPRESS	4128 RAINBOW BLVD, KANSAS CITY, KS 66103			RESTAURANT				
PALACE EXPRESS	4128 RAINBOW BLVD KANSAS CITY, KS 66103	(913) 236-4382		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00587
PALETERIA CHIHUAHUA LLC	901 KANSAS AVE, KANSAS CITY, KS			RESTAURANT				
PALETERIA LA MICHOACANA	1259 CENTRAL AVE, KANSAS CITY, KS 66102			FOOD PROCESSING				
PALETERIA TROPICANA 4 LLC	151 S 18TH STE N, KANSAS CITY, KS 66102			RESTAURANT				
PALETERIA Y TAQUERIA LA FUENTE	4301 STATE AVE KANSAS CITY, KS 66102	(913) 514-4562		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00137
PALMERS CANDIES & ICE CREAM	1837 VILLAGE WEST PKWY STE B101			GROCERY STORE				
PANADERIA GUATEMAL TECA Y PULGITA MARKET	1519 MINNESOTA AVE, KANSAS CITY, KS 66102			GROCERY STORE				
PANADERIA GUATEMALTECA Y PULGITA MARKET	1519 MINNESOTA AE, KANSAS CITY, KS 66102			RESTAURANT				
PANDA EXPRESS #1716	10950 STADIUM PKWY KANSAS CITY, KS 66111	(620) 799-9898		RESTAURANT			Accommodation-Food Services - Special Food Services	08980-00813
PANERA BREAD	1811 VILLAGE WEST PKWY STE O 125, KANSAS CITY, KS 66111			RESTAURANT				

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PANTRY (THE)	1800 VILLAGE WEST PKWY, KANSAS CITY, KS			RESTAURANT					
PAPA BOB'S BAR-B-QUE	11610 KAW DR, KANSAS CITY, KS 66111			RESTAURANT					
PAPA JOHN'S PIZZA	400 SPEEDWAY BLVD KANSAS CITY, KS 66111			RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	09980-01003
PAPA JOHN'S PIZZA #2318	7361 STATE AVE KANSAS CITY, KS 66112	(913) 299-1000		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	00980-00000-00096
PAPA MURPHY'S PIZZA	608 TULIP DR STE B, BONNER SPRINGS, KS 66012			RESTAURANT					
PAPA'S PARTNERS, LLC. D/B/A PAPA MURPHY'S PIZZA	7630 STATE AVE KANSAS CITY, KS 66112	(913) 299-0707		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	06980-00000-01099
PAR T PUB	2519 PARK DR, KANSAS CITY, KS 66102			RESTAURANT					
PARALLEL BP	4701 PARALLEL PKWY, KANSAS CITY, KS 66104			CONVENIENCE STORE					
PARALLEL CHINA EXPRESS	4840 PARALLEL PKWY KANSAS CITY, KS 66104	(913) 287-5066		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	99980-00000-05972
PARKER ELEMENTARY	3334 HASKELL, KANSAS CITY, KS 66104			SCHOOL					
PAR-T-PUB	2519 PARK DR KANSAS CITY, KS 66102	(913) 915-0479		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	10980-00752
PATTY'S BURGER SHACK	8049 LEAVENWORTH RD KANSAS CITY, KS 66109	(913) 788-9357		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	99980-00000-03745
PAUL'S DRIVE IN INC.	1008 OSAGE AVE KANSAS CITY, KS 66105	(913) 371-8490		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	99980-00000-01047
PEDDLER'S DAUGHTER (THE)	3300 MERRIAM LANE, KANSAS CITY, KS			GROCERY STORE					
PENROD BAR B Q	224 S 86TH ST KANSAS CITY, KS 66111	(913) 788-9143		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	99980-00000-01477
PEPE'S	3208 STRONG AVE, KANSAS CITY, KS			GROCERY STORE					
PERKINS RESTAURANT & BAKERY #1073	7262 STATE AVE KANSAS CITY, KS 66112	(913) 788-7101		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	99980-00000-01216
PHILLIPS #707	10950 PARALLEL, KANSAS CITY, KS			GROCERY STORE					
PHOENIX THEATRES LEGENDS 14	1841 VILLAGE WEST PKWY, KANSAS CITY, KS 66111			RESTAURANT					
PIN UP BOWL	1859 VILLAGE WEST PKWY, KANSAS CITY, KS 66111			RESTAURANT					
PIPER ELEMENTARY SCHOOL EAST	4410 N 107TH ST, KANSAS CITY, KS 66109			SCHOOL					
PIPER ELEMENTARY USD 203	3131 N 122ND ST, KANSAS CITY, KS 66109			SCHOOL					
PIPER MIDDLE SCHOOL	4420 N 107TH ST, KANSAS CITY, KS 66109			SCHOOL					
PIPER SR HIGH	4400 N 107TH, KANSAS CITY, KS 66109			SCHOOL					
PIZZA HUT	13028 KANSAS AVE, BONNER SPRINGS, KS 66012			RESTAURANT					
PIZZA HUT #4712	4601 SHAWNEE DR KANSAS CITY, KS 66106	(913) 262-0680		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	08980-01020
PIZZA HUT #4716	4825 STATE AVE KANSAS CITY, KS 66102	(913) 287-1651		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	08980-01022
PIZZA HUT #4720	3600 STATE AVE KANSAS CITY, KS 66102	(913) 621-7333		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	08980-01023
PIZZA HUT #4721	4200 RAINBOW BLVD KANSAS CITY, KS 66103	(913) 432-2135		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	08980-01024
PIZZA HUT #4722	1930 N 77TH ST KANSAS CITY, KS 66112	(913) 788-2882		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	08980-01019
PIZZA HUT #4750	10940 PARALLEL PKWY 4750 KANSAS CITY, KS 66109	(913) 334-1626		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	08980-01031
PIZZA STOP	7541 LEAVENWORTH RD KANSAS CITY, KS 66109	(913) 334-2803		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	99980-00000-00895
PLAZA TOWERS NUTRITION	1200 N 75TH PLACE, KANSAS CITY, KS			RESTAURANT					
PLEASANT GREEN BAPTIST CHURCH	340 DAVID L GREY, KANSAS CITY, KS			RESTAURANT					
POLLO LOKO	6522 KAW DR KANSAS CITY, KS 66111	(913) 530-1099		RESTAURANT				Arts-Entertainment-Recreation - Amusement-Recreation Indus	10980-00304
POSTON DONUTS	2131 S 34TH ST KANSAS CITY, KS 66106	(913) 362-0244		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	10980-00539
PREMIUM VENDING INC.	400 SPEEDWAY BLVD KANSAS CITY, KS 66111	(678) 283-2220		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	02980-00000-00439
PREMIUM WATER INC	1510 S 42ND ST, KANSAS CITY, KS 66106			FOOD PROCESSING					
PRICE CHOPPER #006	7734 STATE AVE, KANSAS CITY, KS 66112			GROCERY STORE					
PRICE CHOPPER #7	4301 STATE AVE, KANSAS CITY, KS 66102			GROCERY STORE					
PRINCE HALL GRAND LODGE, INC.	1234 STATE AVE KANSAS CITY, KS 66102	(913) 281-1487		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	06980-00000-00988
Q BREW COFFEE & DELI (THE)	1744 QUINDARO, KANSAS CITY, KS			RESTAURANT					
Q SAVE	701 CENTRAL AVE, KANSAS CITY, KS 66101			CONVENIENCE STORE					
Q SAVE #3	954 STATE AVE, KANSAS CITY, KS 66101			CONVENIENCE STORE					
QUE DESTINATION	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT					
QUICK MART	2406 S 51ST ST, KANSAS CITY, KS 66106			CONVENIENCE STORE					
QUICK SERVICE	7959 STATE AVE, KANSAS CITY, KS 66112			GROCERY STORE					
QUICK SHOP #1	3200 STATE AVE, KANSAS CITY, KS 66102			CONVENIENCE STORE					
QUICK SHOP #2	2425 METROPOLITAN, KANSAS CITY			GROCERY STORE					
QUICK SHOP #3	5568 LEAVENWORTH RD, KANSAS CITY, KS 66104			CONVENIENCE STORE					
QUICK SHOP #4	4732 STATE AVE, KANSAS CITY, KS 66102			CONVENIENCE STORE					
QUICK SHOP #5	4201 SHAWNEE DR, KANSAS CITY, KS 66106			CONVENIENCE STORE					
QUICK SHOP BP AMOCO	300 N 78TH ST, KANSAS CITY, KS 66112			RESTAURANT					
QUICK TRIP #172	8200 PARALLEL, KANSAS CITY, KS 66112			CONVENIENCE STORE					
QUICK TRIP #199	389 N 130TH ST, BONNER SPRINGS, KS 66012			CONVENIENCE STORE					
QUICK TRIP #231	4202 KANSAS AVE, KANSAS CITY, KS 66106			CONVENIENCE STORE					
QUICK TRIP #239	555 N 78TH ST. KANSAS CITY, KS 66106			CONVENIENCE STORE					
QUICK'S B B Q	1007 MERRIAM LN KANSAS CITY, KS 66103	(913) 236-7228		RESTAURANT				Exempt - Exempt	99980-00000-00795
QUINDARO AMERICAN LEGION	7942 LEAVENWORTH, KANSAS CITY, KS 66109			RESTAURANT					
QUINDARO COMMUNITY CENTER	2726 BROWN AVENUE, KANSAS CITY, KS			RESTAURANT					
QUINDARO ELEMENTARY	2800 FARROW, KANSAS CITY, KS 66104			SCHOOL					
QUINDARO FOOD SHOP	1818 QUINDARO BLVD, KANSAS CITY, KS 66104			GROCERY STORE					
QUIZNOS SUB	1601 VILLAGE WEST PKWY, KANSAS CITY, KS 66111			RESTAURANT					
R & J BAR B Q	8401 PARALLEL PKWY KANSAS CITY, KS 66112	(913) 299-1311		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	99980-00000-02009
R & YAAR FOOD MART	3821 LEAVENWORTH ST, KANSAS CITY, KS 66104			CONVENIENCE STORE					
RACETRACK FOODS INC., D/B/A CULVER'S OF KCK	1925 PRAIRIE XING KANSAS CITY, KS 66111	(913) 400-7300		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	06980-00000-01060
RACHEL'S TEA ROOM	6510 PARALLEL PKWY KANSAS CITY, KS 66102	(913) 334-4343		RESTAURANT				Accommodation-Food Services - Full-Service Restaurants	07980-00000-00418
RACING NOTIONS, INC. D/B/A JAZZ, A LOUISIANA KITCHEN	1859 VILLAGE WEST PKWY #102 KANSAS CITY, KS 66111	(913) 328-0003		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00018
RAINBOW MENNONITE CHURCH	1444 SOUTHWEST BLVD, KANSAS CITY, KS 66103			RESTAURANT					
RANCH BOWL	5604 STATE AVENUE, KANSAS CITY, KS 66102			RESTAURANT					
RANCH WEST	8201 STATE AVENUE, KANSAS CITY, KS			RESTAURANT					
RAPIDO MART I	748 WASHINGTON BLVD, KANSAS CITY, KS 66101			CONVENIENCE STORE					
RAY'S COACH CLUB	1102 OSAGE AVE KANSAS CITY, KS 66105	(913) 371-0400		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01099
RED EYE, INC	6102 STATE AVE KANSAS CITY, KS 66102	(913) 334-6700		RESTAURANT				Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00669
RED FORTUNE CHINESE RESTAURANT	117 OAK, BONNER SPRINGS, KS 66012			RESTAURANT					

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RED LOBSTER #6364	10700 PARALLEL PKWY, KANSAS CITY, KS 66109			RESTAURANT				
RED LOBSTER	14904 W 119TH STREET, KANSAS CITY, KS			RESTAURANT				
REECE'S PLACE LLC	6720 1/2 KAW DR, KANSAS CITY, KS 66111			RESTAURANT				
REGENCY INN	4725 STATE, KANSAS CITY, KS			LODGING				
REICHS CLUB, INC.	3405 STRONG AVE KANSAS CITY, KS 66106	(913) 831-3405		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01329
RENNA, INC. D/B/A QUIZOS SUB	1601 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 334-3483		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	05980-00000-00753
RENNA, INC. D/B/A JAVA LAND	1601 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 334-2017		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	05980-00000-01336
RESTAURANTE LAS PALMAS	825 MINNESOTA AVE KANSAS CITY, KS 66101	(913) 433-2432		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00039
RESTAURANTE SALVADORENO ELMALA	356 N 10TH ST KANSAS CITY, KS 66102	(913) 602-2739		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00642
RESTAURANTE TIERRA CALIENTE	624 KANSAS AVE, KANSAS CITY, KS 66105			RESTAURANT				
RESURRECTION CATHOLIC CHURCH	422 N 14TH, KANSAS CITY, KS 66102			SCHOOL				
REYNA'S TACOS TO GO	78 N 10TH ST KANSAS CITY, KS 66102	(913) 378-6485		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00513
REYNA'S MEXICAN BAKERY	725 KANSAS AVENUE, KANSAS CITY, KS 66105			RESTAURANT				
REYNA'S BAKERY & DISTRIBUTING	727 KANSAS AVE, KANSAS CITY, KS			GROCERY STORE				
REYNA'S MINI MART RESTAURANT & Bakery	939-941 CENTRAL AVE, KANSAS CITY, KS			GROCERY STORE				
RICE BOWL	8226 PARALLEL PKWY KANSAS CITY, KS 66112	(913) 299-8118		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	09980-00967
RICKY'S PIT BBQ	3800 LEAVENWORTH RD KANSAS CITY, KS 66104	(913) 636-5411		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	08980-00000-00278
RISING STARS, LLC D/B/A HARDEES #0544	8021 STATE AVE KANSAS CITY, KS 66112	(913) 299-8523		RESTAURANT			Accommodation-Food Services - Special Food Services	08980-00000-00101
ROBINSON CATERING COMPANY	12416 GRANDVIEW RD GRANDVIEW, MO 64030	(816) 765-4707		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	99980-00000-02516
ROCKY MOUNTAIN CHOCOLATE FACTORY	1837 VILLAGE WEST PKWY B-127, KANSAS CITY, KS 66111			RESTAURANT				
ROGERS PARTY SHOP	1719 N 38TH ST, KANSAS CITY, KS			GROCERY STORE				
ROLL ON CAFÉ	9000 WOODEND RD, EDWARDSVILLE, KS 66111			RESTAURANT				
ROSCOE'S BBQ	9711 KAW DR, EDWARDSVILLE, KS 66111			RESTAURANT				
ROSE'S MARKET	2014 QUINDARO BLVD, KANSAS CITY, KS			GROCERY STORE				
ROSEDALE BARBEQUE INC	600 SOUTHWEST BLVD KANSAS CITY, KS 66103	(913) 262-0343		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	99980-00000-01050
ROSEDALE MIDDLE SCHOOL	3600 SPRINGFIELD, KANSAS CITY, KS 66103			SCHOOL				
ROSEDALE TOWERS NUTRITION SITE	2314 W 39TH, KANSAS CITY, KS			RESTAURANT				
ROSS'S CATERING	829 LAKE FOREST BONNER SPRINGS, KS 66012	(913) -89-8570		RESTAURANT			Accommodation-Food Services - Full-Service Restaurants	08980-00646
ROSS'S CATERING	12601 PARALLEL PKWY, KANSAS CITY, KS			RESTAURANT				
ROWE RIDGE VINEYARD & WINERY	11255 LEAVENWORTH RD, KANSAS CITY, KS 66109			FOOD PROCESSING				
RUBIN PETROLEUM INC	6433 STATE AVE, KANSAS CITY, KS 66102			CONVENIENCE STORE				
RUSSELL STOVER CANDIES, INC	1300 N VILLAGE WEST, KANSAS CITY, KS			GROCERY STORE				
S & A FOOD MART	7347 LEAVENWORTH RD, KANSAS CITY, KS 66109			CONVENIENCE STORE				
S & A FOOD MART	7355 LEAVENWORTH RD KANSAS CITY, KS 66109	(913) 788-4850		RESTAURANT			Accommodation-Food Services - Drinking Places-Alcohol	05980-00000-00349
SABOR Y SOL MEXICAN RESTAURANT	542 SOUTHWEST BLVD KANSAS CITY, KS 66103	(913) 362-0817		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00363
SALVATION ARMY HARBOR LIGHT VILLAGE (THE)	6723 STATE AVENUE, KANSAS CITY, KS			RESTAURANT				
SAMMIE LEE WEST DBA CHICK-FIL-A	10770 PARALLEL PKWY KANSAS CITY, KS 66109	(913) 220-1061		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	10980-00734
SAMMY'S TAVERN	222 N 6TH ST KANSAS CITY, KS 66101	(913) 281-0184		RESTAURANT			Accommodation-Food Services - Special Food Services	02980-00000-00487
SAN-MAN GARDENS	3630 N 65TH ST, KANSAS CITY, KS 66104			FOOD PROCESSING				
SAVE-A-LOT #443/5769	2815 STATE AVE, KANSAS CITY, KS 66102			GROCERY STORE				
SAVE-A-LOT #456	8115 STATE ST, KANSAS CITY, KS 66112			GROCERY STORE				
SCHATZ DISTRIBUTING CO INC	3140 S 28TH ST, KANSAS CITY, KS 66106			FOOD PROCESSING				
SCHLITTERBAHN WATERPARK	9400 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
SCHLITTERBAHN WATERPARK - DIPPIN DOTS	9400 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
SCHLITTERBAHN WATERPARK - ENTRY BUILDING	9400 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
SCHLITTERBAHN WATERPARK - FOOD/BEVERAGE BLDG.	9400 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
SCHLITTERBAHN WATERPARK - HOT DOGS/PRETZELS	9400 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
SCHLITTERBAHN WATERPARK - MIX IT UP	9400 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
SCHLITTERBAHN WATERPARK - RIVER HAUS	9400 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
SCHLITTERBAHN WATERPARK - SURF SIDE SNACKS	9400 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
SCHLITTERBAHN WATERPARK - SWIM UP BAR	9400 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
SCOOTER'S COFFEEHOUSE	1843 VILLAGE WEST PKWY C-103 KANSAS CITY, KS 66111	(913) 328-1454		RESTAURANT			Accommodation-Food Services - Drinking Places (Alcohol)	05980-00000-01402
SCOTTER'S COFFEEHOUSE	7520 STATE AVE, KANSAS CITY, KS 66112			RESTAURANT				
SERGEANTS PET CARE PRODUCTS INC	16 KANSAS AVE, KANSAS CITY, KS 66105			FOOD PROCESSING				
SHAVE SHACK (THE) (MUS282)	3504 N 131ST ST, KANSAS CITY, KS			RESTAURANT				
SHAWNEE APPLE MARKET	2803 S 47TH ST, KANSAS CITY, KS 66102			GROCERY STORE				
SHAWNEE DRIVE DAIRY QUEEN	2815 S 47TH ST KANSAS CITY, KS 66106	(913) 677-9915		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	03980-00000-00583
SHELL ON 38TH	1301 N 38TH ST, KANSAS CITY, KS 66102			CONVENIENCE STORE				
SHERIDAN'S FROZEN CUSTARD, LLC.	1800 PRAIRIE CROSSING KANSAS CITY, KS 66111	(913) 334-0904		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00832
SHIELD KITCHEN	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
SIGNATURE SAUSAGE CO MU 5407	14500PARALLEL PKWY STE B, KANSAS CITY, KS			RESTAURANT				
SHORT STOP 105	51 N 7TH ST, KANSAS CITY, KS 66101			CONVENIENCE STORE				
SHORT STOP 109	2101 METROPOLITAN AVE, KANSAS CITY, KS 66106			GROCERY STORE				
SHOTCALLERS BAR & GRILL	3308 STRONG AVE KANSAS CITY, KS 66106	(913) 766-5540		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	09980-00659
SIGNATURE KITCHEN	ONE SPORTING WAY, KANSAS CITY, KS 66111			RESTAURANT				
SILVA FOODS OF KANSAS CITY INC	2540 WEST 47TH AVE, KANSAS CITY, KS 66103			FOOD PROCESSING				
SILVER CITY ELEMENTARY	2515 LAWRENCE AVE, KANSAS CITY, KS 66106			SCHOOL				
SINGLE FAMILY HOME	3610 OAKLAND, KANSAS CITY, KS 66102			HOME			SINGLE FAMILY HOME	
SISTER WITH ELEGANCE CATERING (A)	3800 WEAVER DRIVE, KANSAS CITY, KS			RESTAURANT				
SISTERS RESTAURANT & BAR	11657 KAW DR, KANSAS CITY, KS 66111			RESTAURANT				
SKATE CITY LEGENDS INC	7838 WASHINGTON AVE KANSAS CITY, KS 66112	(913) 788-7788		RESTAURANT			Accommodation-Food Services - Limited-Service Eating Places	09980-01028
SMOKE EASY ONE	5241 STATE AVE, KANSAS CITY, KS			CONVENIENCE STORE				
SNACK PACK	1705 PARALLEL PKWY, KANSAS CITY, KS			CONVENIENCE STORE				
SNACK PACK	914 S 55TH ST, KANSAS CITY, KS 66106			GROCERY STORE				
SNACK PACK #2	5940 LEAVENWORTH RD, KANSAS CITY, KS 66104			CONVENIENCE STORE				

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SNACK SHOP #105	6001 PARALLEL PARKWAY, KANSAS CITY, KS 66102			CONVENIENCE STORE			
SNAPPY MART 838	838 S 7TH ST, KANSAS CITY, KS 66105			CONVENIENCE STORE			
SNO COOL SHAVED ICE TREATS (MU 2159)	9911 GEORGIA AVE, KANSAS CITY, KS			RESTAURANT			
SONIC	1714 VILLAGE WEST PKWY KANSAS CITY, KS 66109	(913) 299-2335		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00174
SONIC	920 STATE AV KANSAS CITY, KS 66101	(913) 371-8777		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00348
SONIC DRIVE IN	11555 KAW DR, BONNER SPRINGS, KS 66012			RESTAURANT			
SONIC DRIVE IN	5545 LEAVENWORTH RD KANSAS CITY, KS 66104	(913) 596-2737		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-00802
SONIC DRIVE IN	1008 N 78TH ST KANSAS CITY, KS 66112	(913) 334-3344		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-03778
SONIC DRIVE-IN	535 SOUTHWEST BLVD KANSAS CITY, KS 66103	(913) 722-4333		RESTAURANT		Arts-Entertainment-Recreation - Amusement-Recreation Indus	99980-00000-04747
SOY-ZEN ZAY	10550 KAW DR, KANSAS CITY, KS 66111			FOOD PROCESSING			
SPANISH GARDENS FOOD MFG CO INC	2301 METROPOLITAN, KANSAS CITY, KS 66106			FOOD PROCESSING			
SPEEDWAY BAR & GRILL	11635 KAW DR, BONNER SPRINGS, KS 66111			RESTAURANT			
SPEEDWAY CONCESSIONS 1A-B	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT			
SPEEDWAY CONCESSIONS 2A-B	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT			
SPEEDWAY CONCESSIONS 3A-B	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT			
SPEEDWAY CONCESSIONS 4A-B	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT			
SPEEDWAY CONCESSIONS 5A-B	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT			
SPEEDWAY CONCESSIONS 6A-B	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT			
SPEEDWAY CONCESSIONS 7A-B	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT			
SPEEDWAY CONCESSIONS 8A-B	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT			
SPEEDWAY NORTH TOWER KITCHEN	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT			
SPEEDWAY SUPER STORE INC	4746 PARALLEL PKWY, KANSAS CITY, KS 66104			CONVENIENCE STORE			
SPEEDWAY WYANDOTTE KITCHEN	400 SPEEDWAY BLVD, KANSAS CITY, KS 66111			RESTAURANT			
SPEEDY'S CONVENIENCE	141 S 18TH ST, KANSAS CITY, KS			CONVENIENCE STORE			
SPIRIT ISLAND SNACK SHACK	10401 CABELA DR, KANSAS CITY, KS 66111			RESTAURANT			
SPORTS BOX	731 MINNESOTA, KANSAS CITY, KS			RESTAURANT			
SPORTS PAGE LOUNGE	941 N 74TH DR KANSAS CITY, KS 66112	(913) 334-4735		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-02123
ST JOHN CATHOLIC CLUB	414 BARNETT, KANSAS CITY, KS 66101			RESTAURANT			
ST MARGARETS PARK	350 PERRY SQUARE, KANSAS CITY, KS			RESTAURANT			
ST PATRICK CATHOLIC SCHOOL	1066 N 94TH ST, KANSAS CITY, KS 66103			SCHOOL			
ST PATRICKS SCHOOL CAFETERIA	1066 N 94TH ST, KANSAS CITY, KS 66103			RESTAURANT			
ST PATRICK'S PARISH CENTER	1086 N 94TH ST, KANSAS CITY, KS 66112			RESTAURANT			
ST PAULS EPISCOPAL CHURCH	1300 N VILLAGE WEST, KANSAS CITY, KS			RESTAURANT			
STANFORD AND SONS	1867 VILLAGE WEST PKWY STE D201, KANSAS CITY, KS 66111			RESTAURANT			
STANLEY ELEMENTARY	3604 METROPOLITAN, KANSAS CITY, KS 66106			SCHOOL			
STARDUST CLUB	1805 MINNESOTA AVE KANSAS CITY, KS 66102	(913) 281-4410		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-00892
STATE SUPERSTORE	7959 STATE AVE, KANSAS CITY, KS 66112			CONVENIENCE STORE			
STERLING-WITTMAN LLC D/B/A STERLING HALL	2420 MERRIAM LN KANSAS CITY, KS 66106	(913) 362-0413		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00837
STIX RESTAURANT	1847 VILLAGE WEST PKWY #R101 KANSAS CITY, KS 66111	(913) 299-3788		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	06980-00000-00560
STOCKYARD (THE) DIP & DOTS CART	1800 WEST VILLAGE PKWY, KANSAS CITY, KS			RESTAURANT			
STONY POINT NORTH ELEMENTARY	8200 ELIZABETH, KANSAS CITY, KS 66112			SCHOOL			
STONY POINT SOUTH ELEMENTARY	150 S 78TH, KANSAS CITY, KS 66111			SCHOOL			
STOP N GO	701 CENTRAL, KANSAS CITY, KS			GROCERY STORE			
STOP N GO #2	1200 CENTRAL, KANSAS CITY, KS			GROCERY STORE			
STOP N GO #3	954 STATE AVE, KANSAS CITY, KS 66101			GROCERY STORE			
STOP N SHOP	2202 W 39TH AVE, KANSAS CITY, KS 66103			CONVENIENCE STORE			
STOP SHOP	6865 STATE AVE, KANSAS CITY, KS 66102			CONVENIENCE STORE			
STRANGERS REST BAPTIST CHURCH	2052 N 5TH ST, KANSAS CITY, KS			RESTAURANT			
STRAWBERRY HILL APPLE MARKET	11 S 10TH ST, KANSAS CITY, KS 66102			GROCERY STORE			
STRAWBERRY HILL PIZZA	2820 W 47TH AVE KANSAS CITY, KS 66103	(913) 281-9000		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	08980-00810
STRAWBERRY SOUTH CLUB	48 S 7TH TRWY KANSAS CITY, KS 66101	(913) 371-4141		RESTAURANT		Accommodation-Food Services - Special Food Services	99980-00000-01142
SUBWAY	1120 N 79TH ST KANSAS CITY, KS 66112			RESTAURANT			
SUBWAY	3714 STATE AVE, KANSAS CITY, KS 66102			RESTAURANT			
SUBWAY	10824 PARALLEL PKWY KANSAS CITY, KS 66109	(913) 299-2950		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	05980-00000-01287
SUBWAY	1235 CENTRAL AVE KANSAS CITY, KS 66102	() 621-0087		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-04719
SUBWAY #13632-91	10902 PARALLEL PKWY KANSAS CITY, KS 66109	(913) 299-9101		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	02980-00000-00715
SUBWAY #15153-75	800 S 7TH TRWY KANSAS CITY, KS 66105	(913) 371-7827		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-04288
SUBWAY #42413-303	10305 LEAVENWORTH RD KANSAS CITY, KS 66109	(913) 334-9094		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	08980-00000-00366
SUBWAY #5086	4603 SHAWNEE DR KANSAS CITY, KS 66106	(913) 384-2456		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	02980-00000-00525
SUBWAY #6679-87	20 N 130TH TERR, BONNER SPRINGS, KS 66012			RESTAURANT			
SUBWAY SANDWICH SHOP #6706	4322 RAINBOW BLVD KANSAS CITY, KS 66103	(913) 262-8782		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-04443
SUBWAY SANDWICHES	718 MINNESOTA AVE KANSAS CITY, KS 66101	(913) 321-1155		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-02878
SUBWAY SANDWICHES	1120 N 79TH ST KANSAS CITY, KS 66112	(913) 334-9725		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-03234
SUMNER ACADEMY	8TH & OAKLAND, KANSAS CITY, KS 66101			SCHOOL			
SUNFLOWER HILLS GOLF COURSE	122ND RIVERVIEW, BONNER SPRINGS, KS 66012			RESTAURANT			
SUNNY CHINA	4633 SHAWNEE DR KANSAS CITY, KS 66106	(913) 236-5333		RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	06980-00000-00585
SUNSET BAR & GRILL	8123 PARALLEL PKWY KANSAS CITY, KS 66112	(913) 299-0022		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	02980-00000-00291
SUPER TACO NAZO	624 KANSAS AVE, KANSAS CITY, KS 66105			RESTAURANT			
SUZIE Q	6720 KAW DR KANSAS CITY, KS 66111	(913) 334-5469		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	10980-00211
SWEETIES KETTLE CORN	10300 CABELA DR, KANSAS CITY, KS 66111			RESTAURANT			
SWIFT SHOP & TOBACCO	1230 CENTRAL AVE, KANSAS CITY, KS 66102			CONVENIENCE STORE			
T N T LIL STURGIS, LLC	6720 KAW DR KANSAS CITY, KS 66111	(913) 299-1170		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	09980-01171
T REX CAFÉ	1847 VILLAGE WEST PKWY STE K125, KANSAS CITY, KS 66111			RESTAURANT			
TA COMO KIERA	2406 S 51ST STREET, KANSAS CITY, KS			RESTAURANT			
TACO BELL # 5084	3948 RAINBOW BLVD KANSAS CITY, KS 66103	(913) 384-5133		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-03441

UNIFIED GOVERNMENT OF WYANDOTTE COUNTY/KANSAS CITY, KANSAS
FOG Control Program

TACO BELL #1601	3651 STATE AVE KANSAS CITY, KS 66102	(913) 321-6680	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01152
TACO BELL #1909	7337 STATE AVE KANSAS CITY, KS 66112	(913) 334-6047	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-01221
TACO BELL STORE #26095	10540 PARALLEL PKWY KANSAS CITY, KS 66109	(913) 328-1203	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	10980-00320
TACO BUENO RESTAURANTS, L.P. #3188	10932 STADIUM PKWY KANSAS CITY, KS 66111	(913) 328-1025	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00467
TACO JOHN'S	13020 KANSAS AVE, BONNER SPRINGS, KS 66012		RESTAURANT			
TACOS EL MATADOR	1230 MERRIAM LN KANSAS CITY, KS 66103	(913) 677-9065	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	09980-00030
TACOS ON WHEELS RESTAURANT	299 S 10TH ST KANSAS CITY, KS 66102		RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00148
TAO-TAO RESTAURANT	1300 MINNESOTA AVE KANSAS CITY, KS 66102	(913) 342-1331	RESTAURANT		Accommodation-Food Services - Drinking Places-Alcohol	99980-00000-00865
TAPATIO MEXICAN GRILL	151 S 18TH ST A KANSAS CITY, KS 66102	(913) 621-5555	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	10980-00428
TAQUERIA & LEGUAS	1706 CENTRAL AVE KANSAS CITY, KS 66102	(913) 321-5300	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	10980-00550
TAQUERIA ARANDAS	7901 STATE AVE KANSAS CITY, KS 66112	(913) 299-8512	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	00980-00000-00612
TAQUERIA ARENOSAS	1203 KANSAS AVE KANSAS CITY, KS 66105	(913) 281-4318	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	00980-00000-00626
TAQUERIA EL POBLANO	1001 OSAGE AVE, KANSAS CITY, KS		RESTAURANT			
TAQUERIA MEXICO # 4	3300 RAINBOW BLVD KANSAS CITY, KS 66103	(913) 722-9200	RESTAURANT		Accommodation-Food Services - Special Food Services	01980-00000-00918
TAQUERIA MEXICO EL RANCHITO	356 N 10TH ST, , KANSAS CITY, KS 66101		RESTAURANT			
TARGET STORE T-2222	10900 STADIUM PKWY KANSAS CITY, KS 66111	(612) 761-2282	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	06980-00000-00794
TBONES CENTERPLATE (CATERING TENT)	1800 VILLAGE WEST PARKWAY, KANSAS CITY, KS		RESTAURANT			
TC MAC COWBOY BBQ (MU 1440)	4026 WOODEND AVE, KANSAS CITY, KS		RESTAURANT			
TEDS MONTANA GRILL	1713 VILLAGE WEST PARKWAY, KANSAS CITY, KS		RESTAURANT			
TEQUILA SPORT BAR	915 KANSAS AVE, KANSAS 66105		RESTAURANT			
TEQUILA SPORT BAR	975 KANSAS AVE, KANSAS CITY, KS		RESTAURANT			
TERIYAKI TO GO	1035 MINNESOTA AVE KANSAS CITY, KS 66101	(913) 321-6565	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	09980-00665
TERRELL'S CATERING	7838 LEAVENWORTH RD KANSAS CITY, KS 66109	(913) 710-7316	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	10980-00396
TERRY EPPS KC BARBEQUE	6666 KAW DR KANSAS CITY, KS 66111	(913) 328-1711	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	05980-00000-00664
TEXAS TOMS BURGER	2222 N 7TH, KANSAS CITY, KS		RESTAURANT			
THE ALIBI CLUB	975 KANSAS AVE KANSAS CITY, KS 66105	(913) 766-7468	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	08980-00000-00481
THE AMAZING DINER & DELI	840 S 55TH ST KANSAS CITY, KS 66106	(913) 287-1177	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	04980-00000-00376
THE BLUE ROSES	1013 CENTRAL AVE KANSAS CITY, KS 66102	(913) 321-7673	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-03614
THE BUBBLE ROOM	1700 CENTRAL AVE KANSAS CITY, KS 66102	(913) 342-4530	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-02668
THE CORNER GRILL	2001 N 5TH ST KANSAS CITY, KS 66101	(913) 281-2217	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	04980-00000-00922
THE HIDEOUT	1410 CENTRAL AVE KANSAS CITY, KS 66102	(913) 967-5200	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	07980-00000-00884
THE NATIONAL GOLF CLUB OF KANSAS CITY	6700 N NATIONAL DR PARKVILLE, MO 64152	(816) 746-0200	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	10980-00555
THE OASIS CLUB, INC.	1111 KANSAS AVE KANSAS CITY, KS 66105	(913) 944-6785	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-02886
THE OLIVE GARDEN ITALIAN RESTAURANT #1795	10670 PARALLEL PKWY KANSAS CITY, KS 66109	(913) 788-9320	RESTAURANT		Accommodation-Food Services - Special Food Services	10980-00274
THE PEDDLER'S DAUGHTER	3300 MERRIAM LANE, KANSAS CITY, KS		GROCERY STORE			
THE PIT BOSS	1044 S 50TH DRIVE, KANSAS CITY, KS		RESTAURANT			
THE WOODYARD LLC D/B/A WOODYARD BAR-B-QUE	3001 MERRIAM LN KANSAS CITY, KS 66106	(913) 362-8000	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	02980-00000-00787
THUNDERLAKE SPEEDWAY	5501 WOLCOTT DR, KANSAS CITY, KS		RESTAURANT			
THOMAS A. EDISON ELEMENTARY	1000 LOCUST, KANSAS CITY, KS 66103		SCHOOL			
TIENDA LA ESPERANZA	1400 S 42ND, KANSAS CITY, 66106		GROCERY STORE			
TIPPINS GOURMET PIES LLC	5350 SPEAKER RD, KANSAS CITY, KS 66105		FOOD PROCESSING			
TITAN CONCESSIONS, LLC	600 N 7TH TRWY KANSAS CITY, KS 66101	(913) 549-4853	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	09980-00845
TO THE HOOP	7912 STATE AVE KANSAS CITY, KS 66112	(913) 334-1700	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-05436
TONY'S DINE-IN	4301 STATE AVE, KANSAS CITY, KS 66102		RESTAURANT			
TOPSY'S POPCORN	1843 VILLAGE WEST PKWY, KANSAS CITY, KS 66111		RESTAURANT			
TORTILLERIA Y CARNICERIA SAN ANTONIO	830 KANSAS AVE, KANSAS CITY, KS 66105		FOOD PROCESSING			
TORTILLERIA Y CARNICERIA SAN ANTONIO	830 KANSAS AVE, KANSAS CITY, KS 66105		GROCERY STORE			
TOWER II DELI	400 STATE AVE KANSAS CITY, KS 66101	(913) 281-3600	RESTAURANT		Accommodation-Food Services - Drinking Places-Alcohol	08980-00000-00596
TRACY'S KITCHEN	3204 PARALLEL, KANSAS CITY, KS		RESTAURANT			
TREAT AMERICA FOOD SERVICE/PROCTOR & GAMBLE	1900 E KANSAS AVE, KANSAS CITY, KS 66105		RESTAURANT			
T-REX CAFE	1847 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(913) 328-1726	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	06980-00000-00540
T'S ON THE AVENUE	751 MINNESOTA AVE KANSAS CITY, KS 66101	(913) 387-4433	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	10980-00727
TUCKERS WELBORN TAVERN	5041 WELBORN LN KANSAS CITY, KS 66104	(913) 596-8825	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	02980-00000-00834
TURNER EARLY LEARNING CENTER	6425 RIVERVIEW, KANSAS CITY, KS 66102		SCHOOL			
TURNER ELEMENTARY	1800 S, 55TH, KANSAS CITY, KS 66106		SCHOOL			
TURNER HIGH SCHOOL	2211 S 55TH ST, KANSAS CITY, KS 66106		SCHOOL			
TURNER MIDDLE SCHOOL	1312 S 55TH, KANSAS CITY, K S 66106		SCHOOL			
TWENTY MEN'S CLUB INC.	2724 N 13TH ST KANSAS CITY, KS 66104	(913) 371-8715	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	99980-00000-01911
TWISTERS GRILL & BAR	13100 KANSAS AVE STE. E, BONNER SPRINGS, KS 66012		RESTAURANT			
UNITED REST. OF VW INC D/B/A STANFORD COMEDY CLUB	1867 VILLAGE WEST PKWY #D201 KANSAS CITY, KS 66111	(913) 400-7500	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	07980-00000-00367
UP YOUR ALLEY, INC DBA RANCH BOWL	5604 STATE AVE KANSAS CITY, KS 66102	(913) 287-6000	RESTAURANT		Accommodation-Food Services - Full-Service Restaurants	08980-00000-00432
US BOAT WORKS & SALVAGE	930 OSAGE, KANSAS CITY, KS 66105		RESTAURANT			
VALERO	4510 KANSAS AVE, KANSAS CITY, KS 66106		CONVENIENCE STORE			
VARIEDADES MULTISER INC	2207 METROPOLITAN AVE, KANSAS CITY, KS 66106		GROCERY STORE			
VENDING 114	ONE SPROTING WAY, KANSAS CITY, KS 66111		RESTAURANT			
VENTURE LOBATO MU 5281	1309 S 36TH STREET, KANSAS CITY, KS		RESTAURANT			
VERNON SENIOR CENTER	3436 NORTH 27TH, KANSAS CITY, KS		RESTAURANT			
VICTORY HILLS SENIOR LIVING COMMUNITY	1900 N 70TH ST, KANSAS CITY, KS		RESTAURANT			
VIETNAM CAFE, LLC	2200 W 39TH AVE KANSAS CITY, KS 66103	(913) 262-8552	RESTAURANT		Accommodation-Food Services - Special Food Services	03980-00000-01155
VIEW ON THE HILL	204 ORCHARD ST KANSAS CITY, KS 66101	(913) 281-0833	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	99980-00000-00913
VOLUME SERVICE, INC. D/B/A CENTERPLATE	1800 VILLAGE WEST PKWY KANSAS CITY, KS 66111	(864) 598-8604	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	06980-00000-00179
VOX THEATER, LLC	1405 SOUTHWEST BLVD KANSAS CITY, KS 66103	(816) 500-4402	RESTAURANT		Accommodation-Food Services - Limited-Service Eating Places	10980-00651
W A WHITE ELEMENTARY	2600 N 43RD TERR, KANSAS CITY, KS 66104		SCHOOL			
WAFFLE HOUSE #1286	4500 KANSAS AVE, KANSAS CITY, KS 66106		RESTAURANT			
WALGREENS #10125	2207 METROPOLITAN AVE, KANSAS CITY, KS 66106		GROCERY STORE			

Appendix K

Public Education and Public Outreach Examples

The Neighborhood Resource Center Development News



UNIFIED GOVERNMENT WYANDOTTE COUNTY / KANSAS CITY, KANSAS
1601 STATE AVE. KANSAS CITY, KANSAS 66102
PHONE (913) 573-5722 FAX (913) 573-5722
WWW.WYCOLCK.ORG

Volume 1, Issue 1

July 2009

Employee Spotlight: Melissa Mitchell, Development Coordinator

Melissa Mitchell joined the Unified Government in January of 2008 to fill the position of Development Review Committee (DRC) Coordinator. The position was created to assist developers, contractors, architects and engineers through the plan review process. Melissa also reviews all of the building permit applications for commercial pro-

jects and reviews for application and plan completion.



Melissa Mitchell, Development Coordinator

The DRC coordinator is also responsible for coordinating and scheduling

pre-application meetings for proposed projects, maintaining the DRC website and is the point of

submission for all Planning Commission development applications. If you have any questions regarding the DRC or commercial building permit applications please contact Melissa at (913) 573-8664 or

mmitchell@wycokck.org.

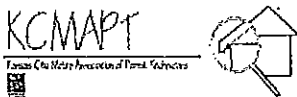
You can also find more information at

www.wycokck.org.

Quick facts:

- Schedule a pre-application meeting with the Development Review Committee prior to a building permit submittal. The purpose of the pre-application meetings is to provide applicants with the opportunity to meet with City representatives, identify potential issues, assist the applicant in preparing their submittal to the City, and to expedite processing of the development application. Pre-application meetings are advisory only.
- Visit the DRC website for plan submittal requirements and check lists.
- Weekly DRC minutes available on website to assist applicant in tracking their project through the plan review process.

KCMAPT June Meeting Held in Kansas City, Kansas



The Kansas City Metropolitan Association of Permit Technicians (KCMAPT) June business meeting was hosted by the Unified Government. KCMAPT is an International Code Council chapter member and provides support for permit technicians in the metro area. The guest speaker was Assistant Fire Chief Brian



Love with the City of Osawatomie. The discussion topic was code footprints and fire submittal documents. In addition to KCMAPT members, UG Building Inspection and Fire Prevention staff attended.



Permit technicians are often the first contact customers have with a building department. They assist customers through the permitting process and the meaning of codes related to their project. Permit technicians review plans and applications for completeness prior to

plan review, calculate permit fees, and issue permits.

The residential permit technician for the UG Building Inspections Department is Dayna Dyer. The commercial permit technician is Melissa Mitchell, DRC Coordinator.



Additional information for KCMAPT and sponsored educational opportunities is available at www.kcmapt.org.

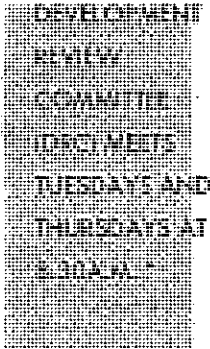
Source: Melissa Mitchell, Development Coordinator

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BUILDING INSPECTION FEE CHANGES	4

Development News

"THE



The Development Review Committee Meetings

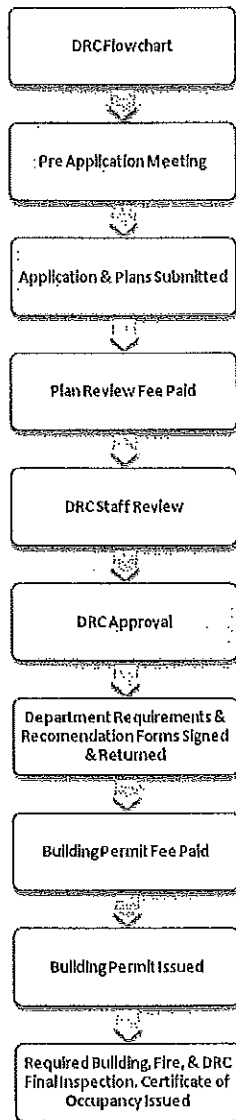
The Development Review Committee (DRC) meets Tuesdays and Thursdays at 8:30a.m. The DRC is comprised of a representative from each reviewing department: Building Inspection, Planning, Engineering, Public Works, B.P.U. Water and Elec-

tric, Fire Prevention, and the Health Department. The committee reviews new commercial projects, additions, occupancy changes, commercial pools, and exterior renovations.

For more information the website at www.wycokck.org.



Meetings are held at 4601 State Ave. Suite 88 Kansas City, Kansas 66102



General Site Plan Requirements

The following is a list of general requirements for a site plan.

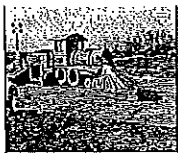
- Project name and address
- Legal description of the development site and vicinity map.
- Building use, type, and/or purpose
- North arrow & scale 1"=20' or 1/16" minimum
- All property lines, all existing and proposed utility and utility easement (s), project benchmark, and right of way
- Location with regard to street (lot and block or tract)
- Propose and/or existing setbacks
- Proposed and/or existing curb cuts
- Proposed and/or existing drives and walks (indicate type of material)
- Proposed existing grades
- Proposed and/or existing off street parking including compliance with ADA
- Proposed and/or existing landscaping (specific type, size and location)
- Proposed and/or existing trash container, bin or dumpster location and screening information
- Flood zone information when applicable
- Structure (s) to be demolished
- Location and size of water main serving lot shown
- Existing and proposed sanitary sewers
- Storm sewer inlets and associated piping if applicable
- Elevations
 - Finish floor
 - Finish curb or crown of street at points of extension of lot lines
 - Locations and existing elevation of sanitary sewer stub to be utilizes by the lot shown including UG node number
 - Location of and existing elevations of upstream and downstream manholes including UG node number
 - Existing and finish elevation at each corner lot
 - Elevations of top of foundation to be utilized by the sanitary sewer

For more information check out the website at www.wycockc.org

Volume 1, Issue 1

Schlitterbahn Vacation Village Waterpark Goes Vertical!

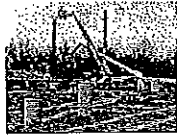
So far the construction process of Schlitterbahn Vacation Village Waterpark has included major site work and construction below or at ground level, but all of this changed on Friday, April 17, 2009 when the first water slide columns went vertical! The



Source UG News

anticipation grows as the momentum continues. The tower supports three tubing slides, including the extra-wide Wolfpack slide, the pitch dark Black Knight slide and the open air Bahnzai Pipeline slide.

The Schlitterbahn Vacation Village Waterpark forges forward with construction. Foundations are being



Source UG News

set in preparation for attractions and buildings. The project is on track for a summer 2009 waterpark opening.

Largest cement pour to date at new Schlitterbahn Waterpark.

Another new milestone is reached at the Schlitterbahn Vacation Village Waterpark site. On Friday, April 17, 2009, the project implemented the largest cement pour to date.

Capri Pools & Aquatics conducted the pour with union labor along with help from



Source UG News

subcontractors that include George J. Shaw Construction and Vee-Jay

Cement Construction. The pour on Friday included some of the final sections of the Torrent River, the world's largest tidal wave river, and the Torrent Cove Beach area.

Source: UG News

For more information go to www.wycokck.org



Schlitterbahn Vacation Village Waterpark is now open!

Unified Government Commission Advance Three Major Economic Development Projects

Despite the national recession, Wyandotte County has scored a trio of major economic development projects creating hundreds of new jobs.

The Unified Government Commission voted on the three deals during its May 28 meeting at 7pm in KCK City Hall, 701 N 7th Street.

The first involves the Sara Lee corporation which plans to open a state-of-the-art manufacturing facility in KCK. The new operation will be located in the former



ConAgra facility on Speaker Road. It's expected to create 200 new jobs with average salaries of \$40,000 annually.

The second project is launch of a new restaurant concept by Steve Schusler, creator of Rain Forest Café and T-Rex Café. Like T-Rex Café, the first-in-the-nation restaurant will be located in The Legends at Village West. The restaurant will offer a roadhouse theme and be partnered with the popular television show, "Orange County Choppers," which features fancy, custom-built motorcycles.

The third project advances the Victory Junction Gang Camp which broke ground in KCK in May.



The camp, started by NASCAR driver Kyle Petty and his wife, provides one-of-a-kind camping and recreational experiences for chronically ill children. Victory Junction Camp Director Mike LaPore made a presentation updating the status of the project.

Representatives and officials from all three projects were available at the meeting.

Source: UG News

"DESPITE THE NATIONAL RECESSION, WYANDOTTE COUNTY HAS SCORED A TRIO OF MAJOR ECONOMIC DEVELOPMENT PROJECTS"



Unified Government Development News
4601 State Ave. Suite
Kansas City, Kansas 66102

New Fee Changes for Building Inspection

On August 1st, the UG will begin charging \$60.00 to sponsor individuals who wish to take a Master's Exam. If they become licensed in Wyandotte County,

that fee will apply towards their initial Master's card.

Also on August 1st, the UG will begin requiring a review fee for commercial building projects

that do not qualify as DRC submittals and on residential apartment buildings consisting of three (3) or more units. The review fee will be assessed at 25% of the total project cost.

For more information contact Building Inspection at (913) 573-8620

Source Building Inspection

State Budget Impacts on Unified Government

The 2009 rescission budget and Fiscal Year 2010 budget approved by the Legislature before the April recess affected most local government revenues in a negative way. The projection of continued declines in state revenues and the need for \$328-million in additional budget cuts are likely to take away even more of the local government revenues promised through negotiated compromises and guaranteed in state law.

The Revenues at Stake

Machinery and Equipment "Slider" Payments: The full

payment due in February was delayed. Half was paid in March. The second half is scheduled to be paid in June. That June payment is estimated at \$25-million statewide. The 2010 "slider" payments, totaling \$50-million statewide, are not in the budget. All of the slider payments are now in jeopardy because the budget conference committee report requires the payments be reviewed in light of new revenue projections.

Special City-County Highway Funds: This fund is paid with motor fuels taxes and a share of motor carrier property tax trans-

ferred from the State General Fund. All but \$5-million of the money owed local governments is scheduled to be paid. Local governments will see a decrease in expected funds. While the loss is not as large as once threatened, it is still significant.

Local Liquor Taxes: After being proposed for elimination, all \$27-million belonging to cities and counties was saved. There is serious concern the liquor tax will again be at risk as the 2010 Omnibus budget is considered.

Local Ad Valorem Tax Reduction Fund: In addition to the

"slider" payments, the Governor and Legislature promised to restart the LAVTR payments in exchange for removing the machinery and equipment property tax. LAVTR provides a dollar for dollar reduction in local property taxes. No LAVTR funds are now allocated.

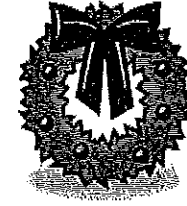
Just to put that in some perspective... the \$6.8-million reduction equates to a 9.5% increase in the property tax mill levy. Replacing the \$8.5-million loss would require about an 11% increase in property tax mill levy.

Source UG News



LIVEABLE NEIGHBORHOODS

NEIGHBORHOOD NEWS



DECEMBER 2010

Liveable Neighborhood's Neighborhood News

Your neighborhood group information can be placed here.

If you would like newsletters made, contact our office at

(913) 573-8737. or email us at vmliveableneighbor@wycokck.org.



Congratulations to the winners of Mayor's Downtown Holiday Lighting Neighborhood Tree Decorating Contest

Grand prize - Turner Neighborhoods

1st Place - Cathedral Neighborhood

2nd Place - Oak Grove Neighborhood

3rd Place - Pomeroy Neighborhood

Congratulations to all of the groups who participated for their hard work and creativity. All of the trees are beautiful and can be viewed at City Hall Monday through Friday 8:00am to 5:00pm until December 30th.

Look for more information about all of the trees at www.wycokck.org under Liveable neighborhoods.

Communities In Schools Needs Volunteers for Reality U Project

The program consists of students answering a 10 question survey on where they want to be by age 26 and looking at their current grade point average (GPA). The students are then "given a life" and are challenged to live out that life through visiting a series of booths (manned by volunteers) based on life necessities such as: child care, the supermarket, car dealers, real estate, medical insurance, ect. As they go along they are met with many challenge and they are forced to make decision based on those challenges. The activities encourage students to make different choices and think about where they are academically. It is a true reality check.

If you are interested in volunteering for the Harmon December 10th program, please contact Dola Williams at (913) 627-4352 or dwilliams@ciskck.org.





December Calendar of Events

11/20/2010 - 12/24/2010

A Legendary Holiday Light Show

Legends Outlets Kansas City 1843 Village West Parkway
913-788-3700 or www.legendsshopping.com

Free

Every Saturday between Thanksgiving and Christmas, the Legends becomes a winter wonderland during the holiday season as two holiday trees feature a spectacular lighting display that is synchronized to music.

12/17/2010

Adventures In Learning (Shepherd's Center)

First Baptist Church 29th and Minnesota
913-281-8908 or www.shepherdscenterkck.org
8:30 a.m. - 1:00 p.m.

Call for a lunch reservation. Join us for adventures in learning. Meet a friend, make a friend.

12/10/2010 - 12/11/2010

Celebration of the Choirs

Imago Dei Arts Center
1015 Minnesota Avenue
913-233-0266 or www.imagodeiarts.org
7pm

Imago Dei Arts Center features the Celebration of the Choirs.

12/10/2010

KCK Second Friday Art Walk

Downtown KCK (multiple venues)
625 Minnesota Avenue
913-371-0024 or www.kckartsnetwork.com
5:00 pm- 8:00 pm Free

A celebration of art, art spaces and art lovers in downtown Kansas City, Kansas. Several galleries will be included in the artwalk.

01/06/2011

Job Hunting and Job Loss Survival

Turner Community Library
831 South 55th Street
913-596-1404

6:00pm to 7:00pm, Free

This computer class covers online resources for the unemployed, job searching online, interview tips and ways to improve your chances of getting hired. Please call to register.

01/11/2011

Personal Financial Organization

West Wyandotte Library
1737 North 82nd Street
(913) 596-5800

7:00pm to 8:00pm, Free

Learn some easy tips to get your finances organized.

Find more event information at www.visitthedot.com

Liveable Neighborhoods Meeting

Due to the Thanksgiving and Christmas Holiday there will not be another Liveable Neighborhoods meeting until Thursday January 27, 2011.



Remember: Unified Government Offices will be closed.

December 23rd (furlough), 24th (holiday) and 31st (holiday).

Good Neighbor Guide

Here are a few examples of common Code Enforcement Violation. Be a good neighbor and make sure you are in compliance.

- All garbage, trash, dead trees and debris must be removed from your property. Garbage or trash cannot be set on the curb for pickup before 4:00 p.m. on the day before your scheduled collection day. You cannot leave trash on the curb after the day of collection.
- Address must be posted on house – All residential property should have an address posted on the house with 3 inch numbers. If you are purchasing new house numbers the new ordinance requires 4 inch numbers.
- Vehicles that are not licensed and cannot move under its own power, cannot be parked on residential property. You cannot park vehicles in your yard unless it is paved with cement, black top or existing gravel. You cannot park tow trucks, dump trucks, semi-tractors and trailers, back hoes, high loaders, or other heavy dirt moving equipment in a residential area.

Important Phone Numbers

City questions and complaints	311
Police Non-Emergency	(913) 596-3000
Liveable Neighborhoods	(913) 573-8737
Community Policing	(913) 573-8720
Code Enforcement	(913) 573-8600
Animal Control	(913) 321-1445
BPU	(913) 573-9000
Deffenbaugh	(913) 631-3300
Potholes	(913) 573-8307
Dispute Resolution	(913) 573-5225

APPENDIX G

Collection System Release Response Plan

**Unified Government of Wyandotte County/
Kansas City, Kansas**

**Collection System Release
Response Plan
(CSRRP)**

Revised August 2012

Unified Government of Wyandotte County/Kansas City, Kansas

Unified Government of Wyandotte County/Kansas City, Kansas

Collection System Release Response Plan

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- 4... TRAINING
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- 7... CSR RECORDKEEPING AND REPORTING
- 8... PRIVATE PROPERTY CSR AND BASEMENT BACK-UP COMPLAINTS
- 9... PUBLIC NOTIFICATION
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11. ENFORCEMENT AND LEGAL AUTHORITY
12. DEFINITIONS

APPENDIX

Collection System Release Response Plan (CSRRP) - Standard Operating Procedures:

- CSRRP - 00 - Purpose Goals Goal attainment and Definitions
- CSRRP - 01 – Collection System Release – Call Routing and Shift Information
- CSRRP – 02 – Inspection and Cleaning of Overflow Structures
- CSRRP – 03 – Collection System Release Response
- CSRRP – 04 – Pump Station Alarm Response
- CSRRP – 05 – Bypass Pumping of Collection System Release
- CSRRP – 06 – Non-Sewage – Potentially Hazardous/Toxic Spills
- CSRRP - 07 – Basement Back-up/Private Property Complaint
- CSRRP – 08 – Notifications: State Agency and Public

Forms:

- WPCD FORM 01 – OVERFLOW STRUCTURE INSPECTION FORM
- WPCD FORM 02 – CSR EVENT REPORT

Unified Government of Wyandotte County/Kansas City, Kansas

Collection System Release Response Plan

1. INTRODUCTION:

The Water Pollution Control Division (WPCD) of the Unified Government of Wyandotte County/Kansas City, Kansas (UG) is responsible for the collection, transport and treatment of domestic and industrial wastewater generated within its service area. The Division operates and maintains approximately 800 miles of sanitary and combined gravity sewers, 90 sanitary and stormwater pumping stations and five sewage treatment plants with a combined capacity to treat an average daily flow of 35 million gallons per day.

As with any sanitary sewer system, events occur that may lead to a release of wastewater from the system. The Collection System Release Response Plan (CSRRP) describes procedures the WPCD utilizes to respond to collection system releases (CSRs).

2. PURPOSE AND OVERVIEW:

The procedures described in the CSRRP and the accompanying Standard Operating Procedures (SOPs) are intended to guide and promote rapid and effective responses that minimize the impact of a collection system release to the public and the environment and to ensure that such releases are thoroughly documented in accordance with state and federal regulations. The goals of the CSRRP are contained in SOP ID No.: CSRRP-00 located in the Appendix.

The SOPs that have been developed for the plan provide a uniform set of procedures and guidelines for field staff, supervisors and managers to follow when responding to a CSR. The related SOPs can be found in the Appendix.

The basic elements of the CSRRP include procedures for: call routing, response to overflows and backups, state agency reporting and public notification. The CSRRP also describes some of the preventive inspection and cleaning procedures that are employed to help minimize the occurrence of CSRs.

3. CSRRP DISTRIBUTION:

Copies of this plan, along with the pertinent SOPs, are distributed to the following UG personnel. Following completion of any revisions or modifications to the CSRRP document due to a periodic review of the plan, the updated plan will be distributed to this same list of staff members.

- Director of Public Works
- Water Pollution Control Director
- Treatment Plant Managers
- Sewer Maintenance Dept. General Manager
- Sewer Maintenance Dept. Supervisors
- Sewer Maintenance Dept. Staff
- Environmental Laboratory Superintendent

- Environmental Laboratory Staff
- Maintenance Superintendent
- Maintenance Electricians
- Maintenance Mechanics
- County Engineer
- Deputy County Engineers
- Engineering Staff
- Fire Department Chief
- Police Department Chief

4. TRAINING

The WPCD will schedule and document training sessions for persons on the distribution list on an annual basis, and as needed for new staff hires. This annual review training will be mandatory for the following individuals:

- Treatment Plant Managers
- Sewer Maintenance Dept. General Manager
- Sewer Maintenance Dept. Supervisors
- Sewer Maintenance Dept. Staff
- Environmental Laboratory Superintendent
- Environmental Laboratory Staff
- Maintenance Superintendent
- Maintenance Electricians
- Maintenance Mechanics

5. NOTIFICATION OF A CSR:

Citizens may report a suspected CSR by calling the Sewer Maintenance Department (SMD) phone number, 913-573-5535, which is listed under “Sewer Complaints” in the *Government* (“Blue”) pages of the phone book. The number is answered 24-hours per day. Citizens may also report sewer problems to the 3-1-1 Call Center Operator between 8:00 a.m. and 5:00 p.m. (Monday through Friday). The call center operator has instructions to forward sewer-related calls to the SMD.

The routing of the call varies depending on the time of day that it is received. Generally, calls received during day shift hours are received by an operator that dispatches an available response crew.

During the afternoon shift and on weekends (day and afternoon shift), one sewer maintenance crew is on-duty. If the crew is unavailable to answer a call, the call is recorded by an answering machine. When the crew returns to the phone station, they check the machine and respond accordingly to any new messages. The answering machine message also directs the caller to another “In Case of Emergency” phone number (913-573-1300) that is staffed 24-hours a day, 7-days per week. The emergency number is answered by a treatment plant operator at the Kaw Point WWTP. The operator, who has access to the on-call maintenance crew and the supervisor’s cell phone numbers, contacts them as soon as he or she is able.

Calls received during the night shift hours are answered by the answering machine as mentioned in the previous paragraph. In cases in which an emergency call is received, the Kaw Point operator on duty contacts the night shift maintenance crew that is on-call as well as the supervisor. If the caller does not call the alternate emergency number, the message is not responded to until the next morning.

Refer to SOP ID No.: CSRRP-01 in the Appendix for more details on call routing for each shift as well as additional contact list phone numbers.

6. CSR RESPONSE:

The CSR Response procedures have been developed to promote rapid and appropriate response to a release. The goal of the response plan is to minimize the impacts of a release to property, public health, and the environment. The Standard Operating Procedures for responding to a CSR are explained in SOP ID No.: CSRRP-03, which can be found in the Appendix. The procedure generally prescribes the following steps:

- secure the area;
- deploy and utilize staff and equipment as needed stop the overflow as rapidly as possible;
- clean the affected area if caused by a public system problem;
- assess the cause;
- document the details of the overflow using a CSR Event Form;
- As required by the NPDES permit, report the event to the Kansas Department of Health and Environment (KDHE);
- Back-ups caused by private sewer lateral problems are not reported to KDHE.

7. CSR EVENT RECORDKEEPING AND REPORTING:

Standard Operating Procedure SOP No.: CSRRP-03 describes the steps field crews and the supervisors are to take during and after a CSR event has concluded. Once the CSR has been mitigated, the response crew completes a CSR Event report form and submits it to the Supervisor for review. The Supervisor verifies that the form is completed correctly and submits it to the Kaw Point Treatment Plant Manager, the Environmental Compliance Supervisor and the Water Pollution Control Director.

A record of each CSR Event is maintained in a CSR Event Log. Each event is assigned a unique identification number. Event records are available for review by SMD Supervisors, the Engineering Department and WPCD Management and other selected staff at the UG's Intranet site. The CSR Event Log can be searched and sorted for various parameters such as manhole number, street address, or cause of the overflow. The information is utilized to identify locations where capital improvement or other preventive actions, such as increased cleaning frequency, or de-rooting are necessary.

The CSR Event Report form, WPCD Form 02, can be found in the Appendix and contains information about the location, conditions and cause of the CSR. A flow estimating guide is

also provided to assist the field crew in estimating the amount of flow that is overflowing if the release is from a manhole.

Procedures have been established to notify and report to the Kansas Department of Health & Environment (KDHE) when a CSR event has occurred. In accordance with SOP ID No.: CSRRP-08, which is included in Appendix, the Kaw Point Plant Manager or the Environmental Compliance Supervisor is responsible for reporting the overflow to KDHE by phone, FAX, or e-mail within 24 hours of the event. Within 5 days of the event, a written Wastewater Bypass Report form is completed and submitted to the KDHE.

8. PRIVATE PROPERTY CSR AND BASEMENT BACK-UP COMPLAINTS:

Complaints of a release of sewage on private property or a basement back-up into a private building are responded to in accordance with SOP No.: CSRRP – 07. These complaints require investigation to determine whether the problem relates to an issue in the public sewer system or the problem has been caused by the private property owner’s sewer lateral or plumbing system. The first responding crew typically assesses the property condition and the flow condition in the public sewer up and down stream of the property lateral connection. In most cases a supervisor is called to the site assist in the evaluation of the situation and the possible cause.

Following an investigation of the event, if it is determined that the problem is not caused by the public sewer system, the resident of the property or property owner is advised to contact a local plumber to resolve the disruption or backup on their property. If a UG public system failure has caused the private system backup, the UG will remedy the problem in the public sewer and work with the property owner to coordinate cleanup. Refer to the Appendix for a copy of SOP ID No. CSRRP-07, which provides guidance to the UG crew for properly responding to a private property sewage release or basement backup.

9. PUBLIC NOTIFICATION:

The decision to notify the public of a CSR event is the responsibility of the Water Pollution Control Director and/or the Public Works Director. If necessary, consultation with the County Public Health Department may occur. The decision to issue a public notice is discretionary on a case-by-case basis. Consideration for such notification may include:

- Magnitude and duration of the release,
- Fish-kill or other significant harm to the environment,
- Release to a high exposure area such as a swimming beach,
- Time of year

Should a collection system release be deemed to pose a threat to public health, the Public Works Director and Public Information Officer will determine the appropriate method of public notification. Methods may include one or more of the following:

- Hand delivery of information bulletins or door hangers in the affected area,
- Temporary sign posting at the affected area,
- Press release to news media.

10. OVERFLOW PREVENTION:

While the CSRRP addresses UG's response to CSR events, it bears noting that UG implements a number of proactive measures to prevent CSRs. These measures seek to address the fundamental cause or source of the overflows. Some activities undertaken routinely include the following:

- Preventive maintenance cleaning and de-rooting schedules in areas where grease or excess root growth is known to have the potential to cause a release.
- Closed Circuit Television (CCTV) inspection equipment is used to detect defects in the gravity sewer system through routine or emergency inspection.
- Automatic alarm notification systems have been installed at all pump stations. The system reports power or phase loss, and high wet well levels that can lead to a CSR. This system allows for rapid response to such a condition.
- Routine inspection of combined sewer overflow structures. Each inspection report is posted to an Inspection Log that is kept available for review by Managers and Engineers on the UG Intranet site
- The Sewer Maintenance Construction Division has expertise and equipment necessary to repair certain defects that may have caused a CSR such as a line or manhole collapse.
- The CMIP budget includes funding for such things as annual line and manhole repair, pump station improvements, construction of relief sewers, and for studies that identify system problems related to infiltration and inflow and capacity deficiencies. As the system is evaluated, construction projects to mitigate CSRs are planned into the budget.

11. ENFORCEMENT AND LEGAL AUTHORITY:

The UG's Code of Ordinances (Code), provides the legal authority for the UG to implement and enforce activities associated with sewer operations. A complete copy of the Code of Ordinances can be obtained from the County or through the website at www.wycokck.org. The primary authority is described in *Chapter 30: Sewers and Sewage Disposal of the Code*.

12. DEFINITIONS:

COMBINED SEWER SYSTEM (CSS) –The portions of the sewer system designed to convey sanitary sewage and stormwater runoff through a single-pipe system to the Kaw Point WWTP or to an authorized CSO Outfall.

CSO OUTFALL – Combined sewer overflow outfall. The structures from which CSOs are authorized to discharge to waters of the United States or the State pursuant to the Kaw Point WWTP NPDES Permit.

CONSTRUCTION DIVISION – A branch of Sewer Maintenance that constructs storm and sanitary sewer line repairs.

CSO – Combined Sewer Overflow. A CSO is a discharge of combined stormwater and sanitary sewage, from a CSO Outfall in response to a precipitation event (rainfall or snow melt).

DISPATCHER (also known as Office Assistant) – Person who receives complaint calls at the Sewer Maintenance Division during day shift operation. The office assistant directs calls to a sewer maintenance response crew.

DRY WEATHER- When no precipitation, including rain, snowfall, snowmelt, and sleet, is occurring or has occurred within the last 24 hours.

ENGINEERING DIVISION – A division of the Public Works Department. The Engineering Division is responsible for design and administration of capital projects and provides engineering assistance to the WPCD.

INFILTRATION and INFLOW (I&I) – Infiltration is water, other than wastewater, that enters the sewer system from the ground through broken service laterals, defective pipes, pipe joints, or manholes. Inflow is water, other than wastewater, that enters the sewer system from sources such as downspouts, foundation drains, yard drains, manhole covers, area drains, and storm sewer cross connections to the sanitary sewer. Excessive I&I reduces the capacity of the sewer system for carrying wastewater and can contribute to CSRs.

FORCE MAIN – Sewer lines that are designed to operate under pressure as a result of pumping.

FOG – Fats, oils and grease which can accumulate in the sewer lines and cause flow restrictions.

GRAVITY SEWER LINE – A sewer line conveys wastewater under the influence of gravity.

INSPECTION – A physical visit to a facility or structure to observe the operations and conditions at the structure. The inspection should be adequate in thoroughness to determine whether the facility or structure is functioning properly and to determine if maintenance or repair is needed.

KDHE – Kansas Department of Health and Environment. KDHE is responsible to issue and enforce NPDES Permits.

KDHE WASTEWATER BYPASS REPORT – CSRs which reach waters of the State are to be reported to KDHE within twenty-four hours of UG becoming aware of the CSR. The 24-hour report may be provided by phone, fax, or email as indicated on KDHE's Bypass Report form. The Report form shall also be mailed to KDHE within five days of UG's discovery of the CSR. The 24-hour notification to KDHE and 5-day written report are to be made by the Kaw Point Plant Manager or his/her designee.

NPDES Permit – National Pollutant Discharge Elimination System Permit. The NPDES Permit authorizes the operation of the UGs wastewater treatment plants and sewer system. The permit establishes minimum operating standards.

PRIVATE LATERAL OR SEWER – That portion of the sewer system not owned by the Unified Government. Typically, includes pipes that convey wastewater from a building to the public sewer. Private laterals do not include connector joints at the public sewer line. Private laterals and sewers are to be maintained by the property owner.

BASEMENT BACKUP OR PRIVATE PROPERTY BACKUP – Any release of wastewater from the sewer system into a privately owned basement or building. It is typically caused by blockage or defect in the either the private sewer line or public sewer system.

PUBLIC SEWER – Sewer lines and structures that are owned, operated and maintained by the UG.

SANITARY SEWER SYSTEM – Wastewater collection and transmission systems. The system includes force mains, gravity sewer lines, pump stations, manholes and appurtenances that are owned and operated by the UG.

Collection System Release (“CSR”) –Collection System Release - Any release of wastewater from the sewer system (other than a CSO).. A wet weather overflow from a permitted CSO overflow structure is NOT a CSR.

CSRRP – Collection System Release Response Plan.

STORM SEWER – System of pipes and inlet structures design to capture and convey stormwater run off to surface water.

WWTP – Wastewater Treatment Plant. The UG owns and operates five (5) WWTPs.

WET WEATHER- When precipitation, including rain, snowfall, snowmelt, and sleet, is occurring or has occurred within the last 24 hours.

WPCD – Water Pollution Control Department



WPCD STANDARD OPERATING PROCEDURES

Title: CSRRP - Purpose, Goals, Goal Attainment and Definitions

SOP Identification No.: CSRRP-00

Revision Date: August 2012 Approved/Date: _____

PURPOSE:

The purpose of developing Standard Operating Procedures (SOP) for the Collection System Release Response Plan (CSRRP) is to provide a uniform set of guidelines for field crews, Supervisors and Managers to follow in response to a Collection System Release (CSR). **The procedures are intended to guide and promote rapid and effective responses that minimize the impact of a CSR to the public and the environment, and to ensure all releases are thoroughly documented in accordance with state and federal regulations.** These procedures are not intended to address every situation in detail. The Standard Operating Procedures for CSRRP are “living documents” and are meant to be modified as areas of improvement are identified.

GOALS AND OBJECTIVES:

1. Goal No. 1 - Minimize the impact of a CSR to public health, property and the environment by rapid, aggressive and effective response in accordance with SOP ID#: CSRP-03.
 - a. Provide CSRP training to new sewer and pump station maintenance employees within the first (1) month of their start date.
 - b. Provide annual CSRP refresher training to all sewer and pump station maintenance employees. Solicit staff input regarding improvements to SOP ID#: CSRP-03. Training attendance records will be kept by the General Superintendents.
 - c. As an internal operations matter, a Supervisor shall review the draft CSR Event Report to ensure that it is completed thoroughly and accurately. The Supervisor shall sign and date all CSR Event Reports. The event will be recorded on the CSR Event Log and made available to Supervisors, Managers and Engineers through the UG Sharepoint site.
 - d. The Sewer and Pump Station Maintenance Supervisors will conduct an annual review of the adequacy of equipment inventory and staff availability. Prepare a report to the General Superintendant to identify any shortfall or additional resource needs. Review may include:
 - i. Vactor Trucks
 - ii. Portable Pumps and Hoses
 - iii. Portable Generators
 - iv. CCTV trucks
 - v. Staffing levels
 - vi. Computer hardware or software.
 - e. Each quarter, the WPCD Management and Engineering Dept. staff will review the CSR Event Log to identify areas of preventive and predictive maintenance improvement and repair priorities and identify areas of improvement with respect to thoroughness of documentation, efficiency and effectiveness of response actions and response times.
2. Goal No. 2 - Meet applicable regulatory notification and reporting requirements.

- a. Implement the use of the revised CSR Event Report form.
- b. Submit all required overflow reports to KDHE within the stipulated timeframe.
3. Goal No. 3 - Prevent dry weather CSRs through preventive and predictive maintenance including sewer system inspections, line cleaning and CCTV.
 - a. Inspect all CSO diversion structures twice per month.
 - b. The Sewer Maintenance General Superintendent will create and update the list of “priority” structures that are to be inspected weekly.
 - c. Conduct an inspection of known pump station related and constructed CSR points a minimum of once per week.

GOAL ATTAINMENT - PROGRESS REVIEW

Annually, the Water Pollution Control Director and the Deputy County Engineer will meet to review progress toward minimizing CSR Events as well as ensuring that all required CSR-related reports have been timely filed with regulatory agencies. They will also review line cleaning and CCTV records and the CSR Event Log. Together they will evaluate progress toward attainment of goals and determine what, if any, modifications would allow unmet goals to be met and to identify areas of improvement. Appropriate follow up action will be taken.

SEWER SYSTEM OVERFLOW RESPONSE OVERVIEW – See attached flow chart.

DEFINITIONS:

BASEMENT BACKUP OR PRIVATE PROPERTY BACKUP – Any release of wastewater from the sewer system into a privately owned basement or building. It is typically caused by blockage or defect in the either the private sewer line or public sewer system.

COMBINED SEWER SYSTEM (CSS) –The portions of the sewer system designed to convey sanitary sewage and stormwater runoff through a single-pipe system to the Kaw Point WWTP or to an authorized CSO Outfall.

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CSRRP – Collection System Release Response Plan.

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ENGINEERING DIVISION – A division of the Public Works Department. The Engineering Division is responsible for design and administration of capital projects and provides engineering assistance to the WPCD.

INFILTRATION and INFLOW (I&I) – Infiltration is water, other than wastewater, that enters the sewer system from the ground through broken service laterals, defective pipes, pipe joints, or manholes. Inflow is water, other than wastewater, that enters the sewer system from sources such as downspouts, foundation drains, yard drains, manhole covers, area drains, and storm sewer cross connections to the sanitary sewer. Excessive I&I reduces the capacity of the sewer system for carrying wastewater and can contribute to SSOs.

FORCE MAIN – Sewer lines that are designed to operate under pressure as a result of pumping.

FOG – Fats, oils and grease which can accumulate in the sewer lines and cause flow restrictions.

GRAVITY SEWER LINE – A sewer line conveys wastewater under the influence of gravity.

INSPECTION – A physical visit to a facility or structure to observe the operations and conditions at the structure. The inspection should be adequate in thoroughness to determine whether the facility or structure is functioning properly and to determine if maintenance or repair is needed.

KDHE – Kansas Department of Health and Environment. KDHE is responsible to issue and enforce NPDES Permits.

KDHE WASTEWATER BYPASS REPORT – CSRs which reach waters of the State are to be reported to KDHE within twenty-four hours of UG becoming aware of the CSR. The 24-hour report may be provided by phone, fax, or email as indicated on KDHE's Bypass Report form. The Report form shall also be mailed to KDHE within five days of UG's discovery of the CSR. The 24-hour notification to KDHE and 5-day written report are to be made by the Kaw Point Plant Manager or his/her designee.

NPDES Permit – National Pollutant Discharge Elimination System Permit. The NPDES Permit authorizes the operation of the UGs wastewater treatment plants and sewer system. The permit establishes minimum operating standards.

PRIVATE LATERAL OR SEWER – That portion of the sewer system not owned by the Unified Government. Typically, includes pipes that convey wastewater from a building to the public sewer. Private laterals do not include connector joints at the public sewer line. Private laterals and sewers are to be maintained by the property owner.

PUBLIC SEWER – Sewer lines and structures that are owned, operated and maintained by the UG.

SANITARY SEWER SYSTEM – Wastewater collection and transmission systems. The system includes force mains, gravity sewer lines, pump stations, manholes and appurtenances that are owned and operated by the UG.

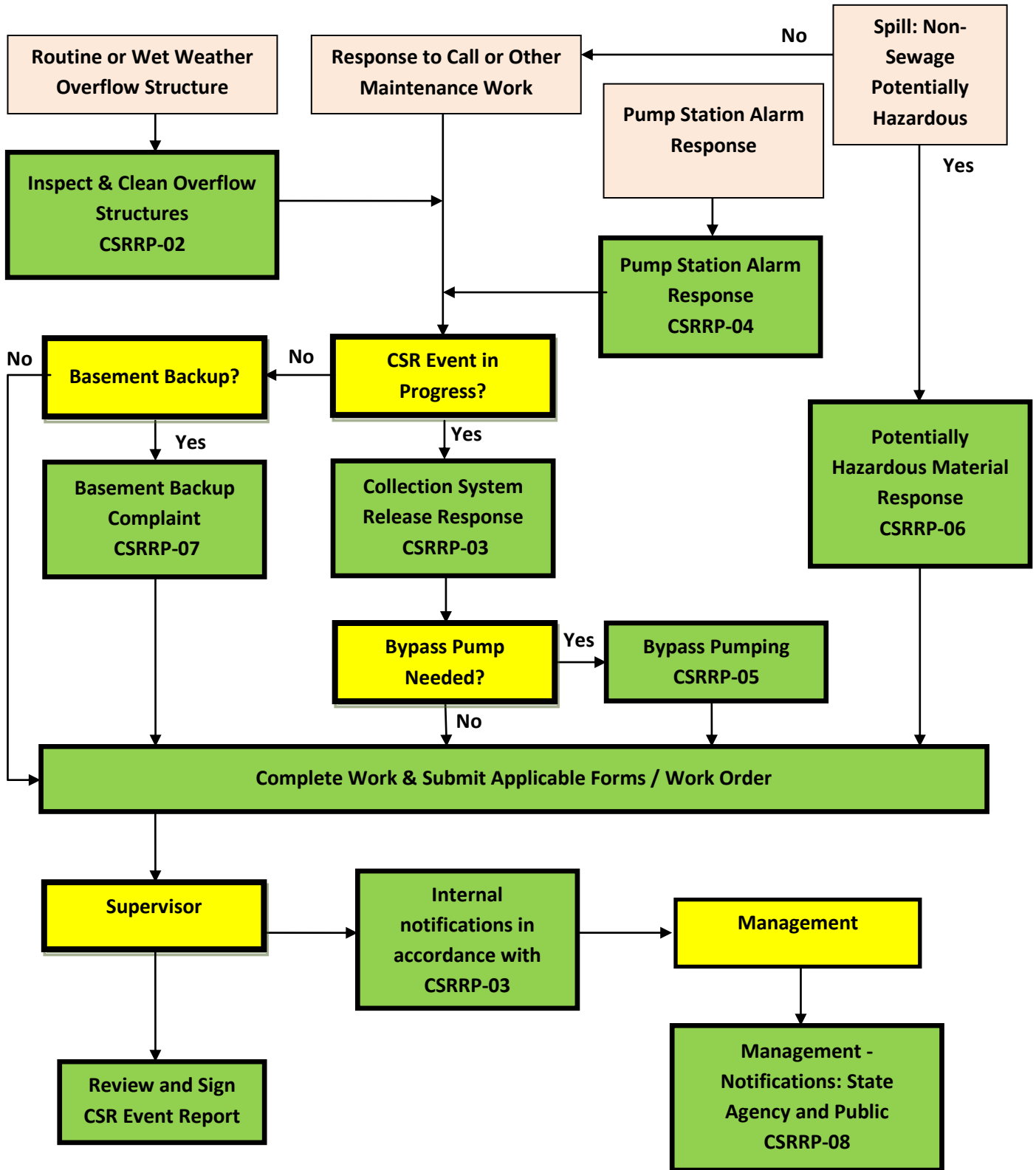
STORM SEWER – System of pipes and inlet structures design to capture and convey stormwater run off to surface water.

WET WEATHER- When precipitation, including rain, snowfall, snowmelt, and sleet, is occurring or has occurred within the last 24 hours.

WPCD – Water Pollution Control Department

WWTP – Wastewater Treatment Plant. The UG owns and operates five (5) WWTPs.

WPCD CSRRP-00: COLLECTION SYSTEM RELEASE RESPONSE OVERVIEW





WPCD STANDARD OPERATING PROCEDURE

Title: Collection System Release – Call Routing and Shift Information

SOP ID No.: CSRRP-01

Revision Date: August 2012 **Approved/Date:** _____

PURPOSE:

To clarify incoming and outgoing call routing during three shift operations.

INCOMING COMPLAINT CALLS:

To report an overflow or sewer problem, citizens can find the phone number of the Sewer Maintenance Division in the “blue pages” (Government section) of the phone book, on the UG web site or by calling directory assistance. The number is 913-573-5535. They can call the number 24 hours a day.

Citizens can also call the 3-1-1 Call Center operator between 8:00 a.m. and 5:00 p.m. (Mon. thru Fri.) to report a sewer problem. The Call Center operator has instructions to forward calls to the Sewer Maintenance number.

CALL ROUTING EACH SHIFT AND HOLIDAYS:

Day Shift

- 7:00 am – 3:30 pm - Labor Day through Memorial Day;
- 6:00 am - 2:30 pm - Memorial Day through Labor Day
 - Sewer Maintenance calls answered by Dispatcher.
 - Pump station alarms are routed to Kaw Point WWTP operator, maintenance staff cell phones, and to Treatment Plant # 20 pager and computer.

Afternoon Shift

- 3:00 pm - 11:30 pm - Labor Day through Memorial Day;
- 2:00 pm - 11:00 pm - Memorial Day through Labor Day
 - One Sewer Maintenance crew on duty. Calls are received at Sewer Maintenance answering machine which includes a message to call Kaw Point WWTP in the event of an emergency. The Kaw Point WWTP Operator contacts field crew on duty to investigate.
 - Pump station alarms are routed the same as day shift.

Night shift

- 11:00 pm - 7:30 am - Labor Day through Memorial Day;
- 10:30 pm - 7:00 am - Memorial Day through Labor Day
 - No sewer maintenance crew on duty, calls are routed the same as the afternoon shift. The answering machine is checked for routine calls when the day shift arrives. If an emergency call comes to the Kaw Point WWTP Operator, the operator calls the maintenance Supervisor to mobilize a response crew.
 - Pump station alarms are routed the same as day shift.

CONTACT LIST:

- | | |
|---------------------------------------------|--------------|
| 1) Public Works Director- | 913-573-5400 |
| a. Robert Roddy | |
| 2) Water Pollution Control Director- | 913-573-1300 |
| a. Jim Larkin | |
| 3) Kaw Point Plant Manager | 913-573-1300 |
| a. Reza Kamyab | |
| 4) Environmental Compliance Supervisor | 913-573-1300 |
| a. Scott Craig | |
| 5) Engineering Division | 913-573-5700 |
| a. John Menkhuis | |
| b. Lori Mundhenke | |
| 6) General Superintendent Sewer Maintenance | 913-573-5000 |
| a. Gerold "Butch" Radke | |
| 7) Supervisors – Sewer Maintenance | 913-573-5000 |
| a. Kirk Roland | |
| b. Jeff Beach | |
| c. Jeff Anderson | |
| 8) General Superintendent Plant Maintenance | 913-573-5000 |
| a. Cary Houchins | |
| 9) Mapping and Records | 913-573-5000 |
| a. Albert Whitaker | |
| 10) Investigation and Code Enforcement | 913-573-1300 |
| a. Steve Lemonds | |
| 11) TO REPORT AN OVERFLOW | 913-573-5535 |
| 12) UG Legal Department | 913-573-5060 |
| 13) KDHE Contact (to report an CSR) | 785-296-5517 |
| 14) Kaw Point WWTP-General Number | 913-573-1300 |
| 15) Plant # 20 WWTP- General Number | 913-441-2255 |
| 16) County Health Department-General Number | 913-573-8855 |



WPCD STANDARD OPERATING PROCEDURE

Title: Inspection and Cleaning of Overflow Structures

SOP Identification No: CSRRP-02

Revision Date: August 2012 **Approved/Date:** _____

PURPOSE:

To establish a procedure for inspecting and cleaning combined sewer overflow structures and routinely inspecting separate sanitary system structures with known overflow problems. These structures are inspected during day shift hours only. Refer to attached flow chart.

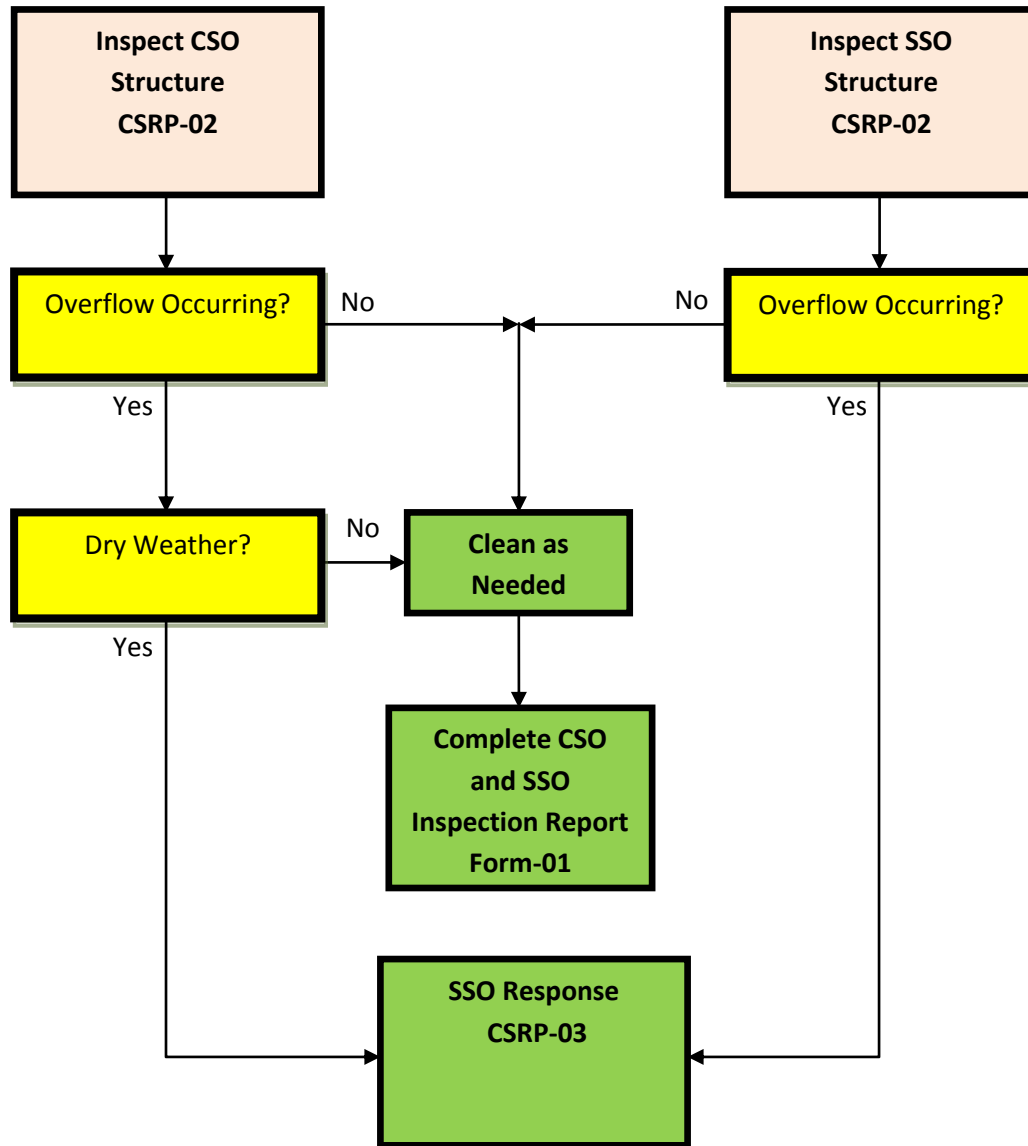
PROCEDURES:

1. Permitted CSO Structure – OVERFLOW IN PROGRESS:
 - a. IF WET WEATHER:
 - i. Complete the Overflow Structure Inspection Report (FORM-01) and continue to next structure.
 - b. IF DRY WEATHER:
 - i. Clear debris to stop overflow and complete CSR Event Report (FORM - 02).
 - ii. If unable to immediately clear debris or stop the overflow, call office assistant for assistance and initiate CSRRP - 03.
2. Permitted CSO Structures – NO OVERFLOW in progress:
 - a. Visually inspect structure for debris or damage that could cause a dry weather overflow.
 - b. Clear debris if possible. If not possible, submit work order for cleaning or repair.
3. Constructed SSOs and known problem areas – OVERFLOW IN PROGRESS:
 - a. Call office assistant and request assistance and initiate SSORP - 03.
 - b. Complete Overflow Structure Inspection Report (FORM - 01).
4. Constructed SSOs and known problem areas – NO OVERFLOW in progress:
 - a. Visually inspect structure for debris or damage that could cause a dry weather overflow.
 - b. Clear debris if possible. If not possible, submit work order for cleaning or repair.
 - c. Inspect for evidence of surcharge or discharge since last inspection, such as high water marks or debris on the ground or at the end of the overflow pipe. Clear debris and record observations.
 - d. Complete Overflow Structure Inspection Report (FORM - 01).

APPLICABLE FORMS AND INFORMATION:

1. OVERFLOW STRUCTURE INSPECTION REPORT, FORM - 01
2. CSR EVENT REPORT, FORM - 02
3. Inspection and Cleaning Flow Chart – attached.

WPCD CSRP-02: INSPECTION AND CLEANING - OVERFLOW STRUCTURES





WPCD STANDARD OPERATING PROCEDURE

Title: Collection System Release Response

SOP Identification No: CSRRP-03

Revision Date(s): August 2012 **Approved/Date:** _____

PURPOSE:

To establish a procedure for responding to a Collection System Release (CSR). A CSR is any release of wastewater from the Collection System. A wet weather overflow from a permitted CSO overflow structure is NOT a CSR. CSRs include wastewater discharge from the system such as gravity line break, overflowing manhole, force main break, flow from a constructed overflow at a pump station or manhole, or a dry weather overflow from a CSO diversion structure. For a basement back-up refer to CSRRP – 07.

The goal of this procedure is respond to overflows quickly and in a manner that avoids or minimizes any impact to property, health, safety and the environment.

PROCEDURES:

RESPONSE CREW:

1. Responsibilities of Crew on arrival where a CSR is occurring:
 - a. Record time of arrival on the CSR EVENT REPORT, FORM – 02, and notify Supervisor of site conditions.
 - b. Take immediate steps to stop the overflow. Steps may include removal of blockage with hand tools, vacuum, jetting, root saw, or manual pump station operation.
 - c. Request assistance or additional resources as needed.
2. When assistance arrives or if it appears that efforts to stop the overflow will not be successful, take immediate steps to protect public health and property and to contain or divert flow, steps may include:
 - a. Minimize and prevent public contact using cones, barricades, signs or flashing lights for site control.
 - b. Use vacuor equipment to reduce the overflow volume or to minimize area of impact.
 - c. Block or place sand bags at storm drains and divert flow to a sanitary or combined system manhole. (Diversion to a storm sewer or nearby stream may be necessary to protect public health and property.)
 - d. Begin bypass pumping in accordance with CSRRP-05- Bypass Pumping of Overflow.
3. Clean sewer overflow site thoroughly after an overflow. Cleaning steps may include:
 - a. Secure the affected area to prevent public contact until the site has been cleaned.
 - b. Flush and remove sewage or wash down with water.
 - c. Pump ponded areas dry.
 - d. Where sewage or other residue can't be removed, treat it with disinfectant (granular disinfectant) and deodorizer (lime).
4. Complete the CSR Event Form (FORM – 02) and submit to Supervisor. Utilize the Flow Estimating Guides in the Appendix to estimate the volume of flow. Obtain assistance from the Supervisor to estimate flow or complete other portions of the form, if needed.

SUPERVISORS:

1. Responsibility of **Supervisor** during and after a collection system release.
 - a. Visit scene if situation or severity warrants.
 - b. Deploy additional resources, direct and coordinate the response as needed.
 - c. By-E-mail, with read receipt box checked, NOTIFY the Kaw Point Plant Manager, the Environmental Compliance Supervisor, and the Director of Water Pollution Control.
 - d. Assist field staff with completion of CSR Event Form (FORM -02) and transmit a copy of the report to the Kaw Point Plant Manager.
 - e. Determine whether follow-up by CCTV, Construction Division or the Engineering Division is needed. Notify accordingly.
 - f. Enter or ensure that event information is logged into the CSR Event Log .
 - g. Where the overflow is caused by a SEPTIC TANK FAILURE, notify the Health Department. The Health Department is responsible for enforcement action related to failed septic tanks.
 - h. Where the release is caused by a PRIVATE SOURCE such as a failed SERVICE LATERAL, inform the property owner that the public sewer has not caused the problem and the owner will need to hire a plumber to correct the problem. Also, notify the Engineering Support Supervisor for further investigation and enforcement of private repairs.

APPLICABLE FORMS AND INFORMATION:

1. CSR EVENT FORM (FORM – 02).
2. Flow Estimating Guides – Appendix.
3. SOP ID#: CSRRP - 05 – Bypass Pumping of Overflow
4. SOP ID #: CSRRP - 07 – Basement Back-up Complaint
5. SOP ID #: CSRRP – 08 – Notifications: State Agency and Public



WPCD STANDARD OPERATING PROCEDURE

Title: Pump Station Alarm Response

SOP Identification No: CSRRP-04

Revision Date: August 2012 **Approved/Date:** _____

PURPOSE:

Describe general steps to follow when a pump station alarm is received and there is a Collection System Release (CSR) occurring or there is the potential for a CSR to occur. Pump stations are equipped with a telemetry system (telephone auto-dialer) to send alarm conditions. Staff responds to multiple types of failure alarms including: distribution system loss of power, equipment related loss of power and equipment failure.

PROCEDURES:

1. Responsibilities of Responding Crew:
 - a. Determine the cause of the failure and proceed with corrective action/repair.
 - b. If it appears the failure may result in a CSR, call a Supervisor and request assistance. Take steps to prevent CSR from occurring or minimize any release. Steps may include:
 - i. Requesting a portable generator,
 - ii. Requesting a vactor or tank truck
 - iii. Requesting a portable pump to pump flow around the station via a by-pass line connection (where available).
 - c. If a CSR occurs, implement CSRRP-03.

APPLICABLE FORMS USED BY THIS SOP:

1. CSR EVENT REPORT (FORM - 02)
2. SOP ID # CSRRP - 03



WPCD STANDARD OPERATING PROCEDURE

Title: Bypass Pumping of Collection System Release

SOP ID No.: CSRRP - 05

Revision Date: August 2012 **Approved/Date:** _____

PURPOSE:

To establish a procedure and guidelines for the set up and operation of portable pumps used during an overflow occurrence or for other purposes. Other actions outlined in SOP ID #: CSRRP-03 apply.

DETAILS:

1. In the course of responding to an collection system release, if other containment measures such as a vactor truck or a diversion into a downstream manhole by gravity is not possible or available, temporary pumping using portable pumps may be necessary.
 - a. Where possible set up the pump(s) and discharge hose(s) to pump to a downstream sanitary or combined sewer manhole. Make every effort to discharge flow to a sanitary or combined sewer. When necessary to protect public health or property, pump to a storm sewer or stream. For reporting purposes, follow the guidelines below:
 - i. Where sewage is pumped to the sanitary or combined system the volume is NOT to be included in the Estimated Overflow Volume on the CSR EVENT REPORT (FORM-02).
 - ii. Where sewage is pumped into a storm inlet or to nearby creek the volume shall be included in Estimated Overflow Volume on the CSR EVENT REPORT (FORM-02).
 - b. When portable pumping equipment is being put into place and during pumping operations, maintain appropriate safety precautions such as road signage, cones, barricades, and flashing lights.
 - c. Monitor the pumps and maintain sufficient fuel on hand to keep pump operational until the release has stopped or other corrective actions have been taken to contain or manage the overflow.
2. Complete the remainder of the response in accordance with CSRRP - 03.

APPLICABLE FORMS AND INFORMATION:

1. CSR EVENT REPORT (FORM - 02)
2. SOP ID#- CSRRP - 03
3. Flow Estimating Guides- Appendix



WPCD STANDARD OPERATING PROCEDURE

Title: Non-Sewage - Potentially Hazardous/Toxic Spills

SOP Identification No.: CSRRP-06

Revision Date: August 2012 **APPROVED/DATE:** _____

PURPOSE:

To establish a procedure for response to spills of non-sewage materials that may be hazardous, toxic, flammable or combustible.

DETAILS:

1. When a field crew is responding to a spill or maintenance call that appears to be a non-sewage material that may be hazardous or is unidentifiable, call 911 to report the spill and request that a HAZ-MAT team be sent to the scene.
2. DO NOT ATTEMPT TO CONTAIN OR HANDLE THE MATERIAL.
3. Immediately notify the Sewer Maintenance Supervisor on duty of the situation. Clearly identify the location, the nature of the material, and whether the material is reaching any inlets or sewers. If unable to reach a Supervisor, immediately notify Kaw Point Plant Operations.
4. Supervisor shall immediately notify Kaw Point Operations (if this has not previously occurred). The Plant Operator receiving the call shall immediately notify the Kaw Point Plant Manager, the Environmental Compliance Supervisor and the Water Pollution Control Director. These individuals will determine the appropriate response for protecting life, health and facilities.
5. In the unusual event that a Supervisor is not on the scene, keep him/her informed as the event develops and when the event has ended.
6. When a HAZ-MAT crew arrives, assist in the manner they request.
7. Provide mapping or information about the sewers in the vicinity of the spill and direction of flow and downstream facilities such as a pump station or treatment plant that may receive the flow. This is especially important if the material is thought to be flammable or combustible as it could cause an explosion or fire at another location.

APPLICABLE FORMS AND INFORMATION:

1. None applicable.



WPCD STANDARD OPERATING PROCEDURE

Title: Basement Back-up/Private Property Complaint

SOP Identification No: CSRRP-07

Revision Date: August 2012 APPROVED/DATE: _____

PURPOSE:

To establish a procedure for responding to and investigating basement back-up or other complaints reported on private property.

PROCEDURES:

1. Responsibilities of Crew on Arrival:

- a. Record the time of arrival at the complaint location on CSR Event Report (FORM – 02).
- b. Make contact with the home or business owner. Present a calm and reassuring appearance as the homeowner may be agitated or upset.
- c. If invited inside to view the condition inside the premises, do so. In some cases a basement back-up can become a legal matter, thus it is important to carefully document conditions, observations, and to take photographs that fairly and accurately depict the situation.
 - i. Make observations:
 1. Approximate depth of water or sewage or size of puddle or pool;
 2. Look for signs of sewage or surface water or groundwater;
 3. Note whether the affected area of the property is finished or unfinished.
 4. Note furniture or other personal property that may be affected;
 - ii. The following photographs are useful:
 1. Front of the house or business, including the house number if possible;
 2. Sufficient shots to determine whether the basement is finished or unfinished;
 3. Sufficient shots to show the level of water or sewage, ensure that there is either a tape measure or something of identifiable size in the background;
 4. Sufficient shots of the furniture or personal property that may be affected.
- d. Explain to the owner how you plan to conduct the investigation.
- e. Conduct investigation to determine whether the back-up has been caused by the public sewer or by a private service lateral or by other non-public conditions. Generally, the investigation requires inspection of the upstream and downstream manholes.
- f. If the back-up is caused by a public sewer problem take immediate steps to clear blockages and restore flow. Complete CSR Event Form (FORM 02). Again, this type of event can become a legal matter, therefore it is very important to document the event thoroughly.
- g. If the back-up has been caused by the owner's private service lateral or another non-public condition, inform the property owner that the public sewer is not causing the back-up and that they will need to hire a plumber to investigate and correct the problem.
- h. IN ALL CASES, IF SEWAGE IS OVERFLOWING TO THE GROUND, INTO THE STREET OR TO A STREAM, IMPLEMENT SOP ID # CSRRP – 03.

2. Prior to leaving the scene:
 - a. A Supervisor should be informed of conditions at the property. Supervisor shall provide additional instructions.
 - b. If, under any circumstance, furnishings are removed from the basement, provide the owner with a release form itemizing the property. Photograph any property that is removed from the basement. Do not remove any personal property from the premises.
 - c. Do not give an opinion as to who will or should pay for clean-up. This determination will be made after the investigation is complete and has been reviewed by management.
 - d. If requested by the property owner, provide the Legal Department phone number, 913-573-5060, and advise them that the line is staffed Monday through Friday between 8 am and 5 pm.
 - e. Provide the property owner with the brochure on Basement Flooding which provides steps for cleaning and sanitation.
 - f. Record all observations and complete and submit the CSR Event Report (FORM – 02).

APPLICABLE FORMS AND INFORMATION:

1. CRS EVENT REPORT – FORM – 02.
2. BASEMENT FLOODING BROCHURE (To be added at a later date.)
3. Property Release Form. (To be added at a later date.)



WPCD STANDARD OPERATING PROCEDURE

Title: Notifications: State Agency and Public

SOP Identification No.: CSRRP-08

Revision Date: August 2012 **APPROVED/DATE:** _____

PURPOSE:

To establish procedures for notifying KDHE when a Collection System Release (CSR) event occurs and for providing notification to the public as warranted.

DETAILS:

1. **KDHE Notification:**

- a. A Supervisor reports a CSR event to the Kaw Point Plant Manager, the Environmental Compliance Supervisor and the Water Pollution Control Department Director in accordance with CSRRP - 03.
- b. The Kaw Point Plant Manager or Environmental Compliance Supervisor shall notify KDHE Central Office within 24 hours of the discovery of any CSR event by phone, fax and/or e-mail as follows:
 - 1) cseeds@kdheks.gov
 - 2) Fax 785-296-0086 Attn: Chris Seeds KDHE
 - 3) Phone 785-296-5517: Chris Seeds KDHE
- c. The Kaw Point Plant Manager shall complete the Kansas Department of Health and Environment Wastewater Bypass Report attached to this SOP. This report shall be conveyed by e-mail, fax and/or mail to KDHE within 5 days of the event. E-mail and fax information is shown above. The address for mailed forms is listed below:
 - 1) Kansas Department of Health and Environment
Attn: Chris Seeds
1000 SW Jackson St., Suite 420
Topeka, KS 66612-1367

2. **Public Notification:**

- a. The decision to notify the public of a CSR event is the responsibility of the Water Pollution Control Director and/or the Public Works Director. If necessary, consultation with the County Public Health Department may occur. The decision to issue a public notice will be made on a case-by-case basis. Consideration for such notification may include:
 - a. Magnitude and duration of the release,
 - b. Fish-kill or other significant harm to the environment,
 - c. Release to a high exposure area such as a swimming beach,
 - d. Time of year, and
 - e. Other circumstances regarding the release.

- b. The Public Works Director and Public Information Officer will determine the appropriate method of public notification. Methods may include one or more of the following:
 - a. Hand delivery of information bulletins or door hangers in the affected area,
 - b. Temporary sign posting at the affected area such as a swimming beach or other recreational area,
 - c. Press release to news media.

APPLICABLE FORMS AND INFORMATION:

- 1. KDHE Wastewater Bypass Report.



OVERFLOW STRUCTURE INSPECTION REPORT

(Complete one report for every inspection.)

SSO No. (or Location): OR CSO No. :	Date:
	Time: AM PM
Inspector(s):	
Reason for Inspection: Routine Wet Weather Complaint Other (explain): (circle one)	
Weather: Sunny Cloudy Rainy Rain for Several days (circle one) Snow Snow & Ice Snow/Ice Melt	Rainfall/Snow Melt in last 24 hrs.: Yes No inches
Is an overflow in progress? Yes No	
Is it a wet weather overflow from a permitted CSO? Yes No (If Yes, skip next 2 questions.)	
If overflow is in progress AND the answer to the question above is NO, initiate Sewer Overflow response per SSORP-03. Form 02 must be completed.	
If No overflow is in progress, is there evidence that an overflow has occurred since the last inspection? Yes No <u>Describe:</u>	
Was any preventive or corrective maintenance completed? Yes No <u>If so, describe:</u>	
Is any maintenance or action recommended? Yes No <u>If Yes, describe here and submit work order.</u>	
Work order submitted? Yes No WO No.: _____ WO Completed? Yes No	
Other notes or observations:	

Knowingly making a false statement on any report of information to comply with an NPDES permit may result in criminal penalties, as provided for in Section 3090 of the the Federal Clean Water Act.

Supervisor (initial and date):



EVENT NO. _____

W.O. NO. _____

CSR EVENT REPORT

CSR Location (address):	
Reported by:	Date:
	Time: _____ AM _____ PM
Time Crew Arrived At Site:	CSR End Date:
	CSR End Time:
Crew:	CSR Duration:
Manhole #, Line Segment, Pump Station or CSO Diversion #:	
Weather: Sunny Cloudy Rainy Rain for Several days	Rainfall/Snow Melt in last 24 hrs.:
Snow Snow & Ice Melting Snow/Ice	Yes No inches
Destination of sewage?	
Basement Storm Drain Yard/Land Surface Water Sanitary/Comb Sewer Other _____	
Contained/Captured _____%	
Name of surface water (if applicable):	

Sewage Originated From:

(Check all that apply)

- PLANT
- PUMP STATION
- PEAK FLOW BASIN/LAGOON
- MANHOLE
- PUBLIC SEWER LINE
- AERIAL CROSSING
- PRIVATE SEWER LINE
- SEPTIC TANK
- CSO DIVERSION MH
- OTHER: EXPLAIN BELOW

Cause of CSR: (explain details below)

(Check all that apply)

- INTENTIONAL FOR MAINT/REPAIR
- EQUIPMENT OR CONTROL FAILURE
- POWER FAILURE
- OPS OR MAINT RELATED FAILURE
- UNPLANNED CONSTRUCTION RELATED
- INSUFFICIENT WET WEATHER CAPACITY
- LINE BREAK OR COLLAPSE
- DEBRIS (DESCRIBE BELOW)
- ROOTS
- GREASE
- VANDALISM
- OTHER: EXPLAIN

Comments/Corrective action taken:

**KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
WASTEWATER INCIDENT REPORT FORM**

Definitions are available at <http://www.kdheks.gov/water/tech.html>

Collection System Bypass In-Plant Diversion Upset In-Plant Flow Through Spill

1. FACILITY NAME: _____ Kansas Permit # _____
2. Within 24 hours of discovery, notify the KDHE Central Office (email – cseeds@kdheks.gov), (fax 785.296.0086), (telephone 785.296.5517) or your local KDHE district office. Written notification is required within 5 days of discovery. If the incident is not corrected within 5 days, send a written notification to KDHE indicating the status. This form is to be sent to KDHE when the incident ends.

KDHE Person Contacted: _____ Date: _____ Time: _____

3. Date Incident Discovered: _____ Time: _____
4. Date Incident Ended: _____ Time: _____
5. Total estimated gallons bypassed, spilled, or routed through failed equipment for all locations on this form: _____
6. If rainfall induced event, approximate inches of rainfall _____
If multiple locations listed below due to rain event, check here

7. Incident Location: (check all that apply)

<input type="checkbox"/> Plant	<input type="checkbox"/> City Collection Line (Line Break / Joint)
<input type="checkbox"/> Lift/Pump Station	<input type="checkbox"/> Private Sewer Line
<input type="checkbox"/> Peak Flow Basin	<input type="checkbox"/> Basement
<input type="checkbox"/> Manhole(s)	<input type="checkbox"/> Other (specify below)

Identify **All** Incident Locations by Name, Street Address or Manhole Number as appropriate.

8. Cause of Incident:

<input type="checkbox"/> Intentional Bypass for Repair/Construction	<input type="checkbox"/> Equipment Failure
<input type="checkbox"/> Excessive Rainfall, Snow Melt	<input type="checkbox"/> Control System Failure
<input type="checkbox"/> Unplanned Construction Related Break	<input type="checkbox"/> Power Related Failure
<input type="checkbox"/> City Line Break (Not Construction Related)	<input type="checkbox"/> Operations Related Failure
<input type="checkbox"/> City Line Blockage	<input type="checkbox"/> Maintenance Related Failure
<input type="checkbox"/> Private Line Break	<input type="checkbox"/> Vandalism
<input type="checkbox"/> Private Line Blockage	<input type="checkbox"/> Other
<input type="checkbox"/> Lagoon High Level	

Additional explanation of reason for Incident: (use additional page if necessary)

9. Corrective Action, if any: (use additional page if necessary)

Name: _____ Date: _____
Title: _____ Phone: _____

When Completed, E-mail to: cseeds@kdheks.gov
 Kansas Department of Health & Environment – Attn: Chris Seeds
 Or Mail to: 1000 SW Jackson St., Suite 420, Topeka , KS 66612-1367
 Fax 785.296.0086

APPENDIX H

Nine Minimum Controls Plan

Unified Government of Wyandotte County/Kansas City Kansas

2012 Nine Minimum Controls Plan

(Replaces 1998 UG NMC Plan)

For the Combined Sewer System



Sept. 15, 2012

Unified Government of Wyandotte County/Kansas City Kansas

2012 Nine Minimum Controls Plan

For the Combined Sewer System

(Replaces 1998 UG NMC Plan)

Sept. 15, 2012.

1. Introduction

This document presents the updated Unified Government of Wyandotte County / Kansas City, Kansas (UG) Combined Sewer Overflow Nine Minimum Control Plan. A Nine Minimum Control (NMC) Plan is one of the three principal elements of the National CSO control Policy. The NMC are intended to address the technology based requirements of the Clean Water Act. The other two elements are:

- The development of a Long Term Control Plan to bring CSO discharge points into compliance with the water quality – based requirements of the Clean Water Act
- Review and where appropriate, revise water quality standards.

The NMC were conceived by the CSO Management Committee formed prior to the issuance of the 1994 National CSO policy. The Management Committee was comprised of Wastewater Utility Directors, Environmental Advocacy Group representatives and Federal and State Regulators. As stated by Michael Cook Director of the Office of Wastewater Management in the USEPA Guidance for Nine Minimum Controls the NMC are “technology-based controls that can be used to address CSO problems without extensive engineering studies or significant construction costs, prior to the implementation of long-term control measures.”

The Unified Government has been successfully implementing its approved NMC program under their Kaw Point Wastewater Treatment Plant (WWTP) NPDES permit issued by The Kansas Department of Health and Environment (KDHE). The first Kaw Point permit addressing the NMC was issued in 1996 and the first Annual NMCs Report was submitted in 1998. This 2012 updated NMCs Plan updates the previous plan based on current conditions.

2. Regulatory Background

This NMC Plan is governed by Federal and State laws as implemented through the UG's Kaw Point NPDES permit. To address these requirements, this NMCs Plan includes how each of the NMC requirements are documented, a schedule for minor construction projects to support the NMCs and an outline of the **Annual NMCs Report** to be submitted annually by February 28th. The United States Environmental Protection Agency Combined Sewer Overflow Control Policy requirements for NMCs are as follows:

2.1 Implementation of the Nine Minimum Controls

Permittees with CSOs should submit appropriate documentation demonstrating implementation of the nine minimum controls, including any proposed schedules for completing minor construction activities. The nine minimum controls are:

- 1. Proper operation and regular maintenance programs for the sewer system and the CSOs;*
- 2. Maximum use of the collection system for storage;*
- 3. Review and modification of pretreatment requirements to assure CSO impacts are minimized;*
- 4. Maximization of flow to the POTW for treatment;*
- 5. Prohibition of CSOs during dry weather;*
- 6. Control of solid and floatable materials in CSOs;*
- 7. Pollution prevention;*
- 8. Public notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts; and*
- 9. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.*

Selection and implementation of actual control measures should be based on site-specific considerations including the specific CSS's characteristics discussed under the sewer system characterization and monitoring portions of this Policy. Documentation of the nine minimum controls may include operation and maintenance plans, revised sewer use ordinances for industrial users, sewer system inspection reports, infiltration/inflow studies, pollution prevention programs, public notification plans, and facility plans for maximizing the capacities of the existing collection, storage and treatment systems, as well as contracts and schedules for minor construction programs for improving the existing system's operation. The permittee should also submit any information or data on the degree to which the nine minimum controls achieve compliance with water quality

standards. These data and information should include results made available through monitoring and modeling activities done in conjunction with the development of the long-term CSO control plan described in this Policy.

2.2 Kansas Permit No. M-MO25-I001 – Kaw Point

The most recent draft Kaw Point permit includes the following Nine Minimum Control Plan Requirements:

The Permittee shall continue to comply with the Nine Minimum Controls Plan (NMCP) pursuant to the terms and conditions of this permit until a new permit is issued or other enforcement agreement covering this subject is reached. At that point, control and reporting on the Nine Minimum Controls Plan shall be determined in accordance to the terms and conditions of the agreement. While under the control of this permit, the Permittee shall continue to comply with the current Nine Minimum Controls Plan and report the status of the requirements in the Nine Minimum Controls Plan annually by February 28 of each year for the previous calendar year.

3.0 Procedures and Documentation of the NMC

This section describes the procedures and documentation that comprise the UG's NMCs plan.

3.1 Conduct Proper Operations and Regular Maintenance Programs.

Designate the UG Collection System Manager (CSM) to be responsible for the wastewater collection system and serve as the contact person regarding the Combined Sewer System (CSS). The CSM is responsible to ensure the availability of trained staff to complete the operation and maintenance functions required to address this NMC Plan. The initial CSM is Mr. James Larkin.

Allocate adequate funds specifically for operation and maintenance activities.

Inspect each CSO structure a minimum of once a week, in accordance with the CSO inspection schedule unless weather or other conditions necessitate schedule deviations.

Provide on-the-job training to new sewer maintenance employees. As warranted, designated staff members will receive periodic classroom training.

Perform preventive maintenance (PM) at mechanical tipping regulators in accordance with established PM schedule and procedures. Maintain a work order system to generate work orders for PM in accordance with the schedule. Work orders will remain open until the PM procedure is completed.

Perform preventive maintenance (PM) at pump stations in accordance with established PM schedule and procedures. Maintain a work order system to generate work orders for PM in

accordance with the schedule. Work orders will remain open until the PM procedure is completed.

Perform regular sewer system maintenance including:

- Sewer Line Cleaning in accordance with the PM schedule.
- Sewer Line Cleaning in accordance with the Deroot and Grease “Hot Spot” PM schedule.
- Sewer Line Inspection using CCTV as needed to support operation and maintenance activities.

3.1.1 Documentation:

Maintain and periodically update an organizational chart of Water Pollution Control Division.

Maintain and periodically update a list of CSO outfalls and diversions as changes or modifications occur. Maintain a record of formal classroom sewer maintenance training including the subject, names of trainees, and date.

Maintain a log of CSO inspections including date and inspection notes.

Maintain original O&M manuals for pump stations in manuscript form and in a scanned computer library.

Maintain preventive/routine maintenance procedures and schedules in a computerized maintenance management system (CMMS).

Maintain a record of the miles of sewer line cleaned each month in the CSS area.

Maintain a record of lines that are cleaned in accordance with the deroot and grease “hot spot” PM schedule.

Include in the Annual NMCs Report a budget showing that the necessary funds, equipment and personnel have been committed to carry out the O & M plan for the next fiscal year. Annually certify that the allocated adequate funds are available for NMC operation and maintenance activities in the CSS.

3.2 Maximize Use of the Collection System for Storage

Conduct a study to determine whether minor CSO weir elevation and/or diversion structure modification would improve diversion structure performance in wet and/or dry weather.

3.2.1 Documentation

Provide a report on the diversion structure evaluation with the 2014 NMC annual report.

Provide a listing of any modifications to regulators or outfalls resulting from the study mentioned above for the preceding year in the NMC Annual report.

Maintain a record of any I/I studies or evaluations conducted in the CSS as part of the IOCP development.

3.3 Control of Non-domestic Discharges

Continue to implement and periodically update an industrial pre-treatment program.

Develop and implement a Fats, Oil and Grease Control Program to reduce the potential for accumulations of FOG that may impact sewer system capacity.

Conduct annual or semiannual meetings with the identified permitted industries to discuss the feasibility of wet weather discharge control plans and operational or low-cost structural modifications that would be beneficial to preventing pollutant discharges during a combined sewer overflow event.

3.3.1 Documentation

Provide an Industrial Pretreatment Program summary.

Provide documentation regarding the UG's efforts to develop and implement the FOG program as part of the IOCP annual report.

3.4 Maximize Flow to POTW

Several Improvements to the Kaw Point WWTP to maximize treatment of wet weather flows have been completed. These improvements have been reported in years prior to 2010.

Maximize flow to the Kaw Point WWTP is described by the Kaw Point WWTP High Flow standard operating procedure.

Conduct a wet weather capacity assessment Kaw Point WWTP to determine whether additional wet weather flow could be treated and discharged without exceeding the NPDES permit effluent limits.

3.4.1 Documentation

Provide the Kaw Point WWTP wet weather capacity assessment results in the 2015 NMC Annual Report.

Provide and periodically update a wet weather standard operating procedure for the Kaw Point WWTP.

3.5 Combined Sewer Overflows During Dry Weather.

Overflows from CSS outfalls during dry weather conditions are rare. Dry weather flow conditions comprise the periods when flow in a combined sewer results from sanitary sewage, industrial wastewater and infiltration/inflow; with no contribution from storm water runoff or storm water induced infiltration. Wet weather flow conditions comprise periods when the flow in a combined sewer includes storm water runoff and/or storm water induced infiltration.

As described in Section 3.1, CSO diversion structures are inspected weekly. If the inspector detects the occurrence of a dry weather overflow, take corrective action in accordance with the Collection System Release Response Plan (CSRRP).

As described in Section 3.2 above, conduct a study to determine whether minor CSO weir elevations and/or diversion structure modification would improve diversion structure performance during dry and/or wet weather.

Upon completion of the CSO diversion structure evaluation, construct any modifications which may be appropriate and effective in further minimizing dry weather overflows at certain structures. Complete recommended minor modifications by December 31, 2016

3.5.1 Documentation

In accordance with the CSRRP, report dry weather overflows to KDHE within 24 hours of when the CSM becomes aware of the dry weather overflow.

As described in Section 3.2, provide a listing of any modifications to regulators or outfalls resulting from the study mentioned above for the preceding year in the NMC Annual report.

3.6 Control Solid and Floatable Materials

In the combined sewer area, conduct street sweeping activities in accordance with SOPs developed for the Stormwater Management Plan (SWMP).

In the combined sewer area, conduct catch basin and storm inlet grate inspections in accordance with the Standard Operating Procedures (SOPs) established for the UG's Stormwater Management Plan (SWMP).

In the combined sewer area, conduct catch basin and storm inlet grate cleaning in accordance with the Standard Operating Procedures (SOPs) established for the UG's Stormwater Management Plan (SWMP).

3.6.1 Documentation

Maintain a record of the street sweeping activities conducted in the CSS in coordination with the records that are maintained for the MS4 Service area as required by the UG's SWMP.

Maintain a record of the number of catch basins and inlet grates cleaned in the CSS in coordination with the records that are maintained for the MS4 Service area as required by the UG's SWMP.

Maintain a record of the number of catch basins and inlet grates inspected in the CSS.

3.7 Develop and Implement Pollution Prevention Program

All of the pollution prevention programs listed below are City-wide programs that include the CSS and MS4 service areas.

Provide a standard specification and detail for new standard stormwater inlet manhole covers. The stormwater inlet manhole casting will be embossed with the following instruction. "Do Not Dump Waste, Exits to River". Standard curb inlets installed after 2008 are required to utilize this detail.

From time to time, provide decals to community groups or individuals, upon appropriate request, for labeling stormwater inlets.

Maintain a Household Hazardous Waste Program for collection of waste oil, automotive fluids, lead acid batteries, waste lawn care and other household hazardous wastes that otherwise may have contributed to water pollution.

As described in the SWMP, maintain pollution prevention / good housekeeping measures internal to the UG such as minimization of chemical inputs (fertilizer and pesticides) for maintenance of parklands and operation of a centralized vehicle wash facility.

The street sweeping and catch basin cleaning programs also prevent large accumulations of pollutants and debris. As discussed under Section 3.6 Solids and Floatables Control, these activities are documented through the UG's SWMP reporting system.

3.7.1 Documentation

Documentation regarding the Household Hazardous Waste Program is contained in the Annual MS4 Compliance Report.

Documentation regarding internal pollution prevention measures is contained in the Annual MS4 Compliance Report.

Documentation regarding the Street Sweeping Program is discussed in Section 3.6 above.

3.8 Public Notification and Education

Public Education, outreach and involvement activities are generally City-wide and include the CSS. They are coordinated through the best management practices (BMPs) and

performance measures identified in the UG's Municipal Separate Storm Sewer System Stormwater Management Plan (SWMP).

Annually verify during periodic CSO inspections, that CSO location identification signs remain in place and in good condition. Replace signs that have been removed or destroyed.

By May 1, 2013 install CSO information signs at selected boats ramps and river access points proximate to CSO outfalls.

By September 30, 2013 conduct a review of the UG website content with regard to basic information on the CSS system. Verify that the site includes links to KDHE and USEPA websites which offer public education information on wet weather issues. The review will include recommendations for information updates to the website.

Periodically produce newsletters and/or pamphlets or web links that provide the public with information on the CSS.

3.8.1 Documentation.

Maintain annual photographic documentation that CSO location identification signs are present and maintained in good repair.

Maintain annual photographic documentation that CSO information signs installed at select boats ramps and river access points proximate to CSO outfalls are present and maintained in good repair.

Documentation regarding the UG's public outreach program regarding water quality issues in the CSS and other areas is contained in the Annual MS4 Compliance Report.

3.9 Monitoring and Modeling

Monitoring of the CSO system was performed from 1993 to early 2000 in support of the development of the November 17, 2000 UG CSO Long Term Control Plan ("2000 LTCP"). Ambient water quality data was collected and documented in the 2000 LTCP. CSS modeling was conducted as a part of the 2000 LTCP as well. This monitoring and modeling is documented in the 2000 LTCP. The monitoring and modeling established that further actions beyond the NMC would be needed to address the CSOs.

Additional monitoring and modeling is being conducted as a part of the IOCP development effort. Documentation of the IOCP monitoring and modeling will be provided with the IOCP and is not a part of the NMC Plan documentation.

4.0 NMCs Annual Report

A draft outline for the Annual NMC report is provided below.

Unified Government of Wyandotte County / Kansas City Kansas

Nine Minimum Controls Annual Report Draft Outline

1. Introduction

1.1. NMC 1 Conduct Proper Operations and Regular Maintenance

1.1.1. Letter of Certification of Adequate Funds.

1.1.2. Sewer System Budget

1.1.3. WPC Organizational Chart

1.1.4. Updated CSO List and Any Changes or Modifications

1.1.5. Sewer Maintenance Training Log

1.1.6. CSO Inspection Log (on CD)

1.1.7. Pump Station O&M Manual Library Index

1.1.8. PM Work Order summary

1.1.9. Sewer Maintenance Division Annual Report including:

1.1.9.1. Miles Sewer Cleaned in the CSS

1.1.9.2. Log of De-root Program Activities in the CSS

1.1.9.3. Summary of Catch Basins and Inlet Grates Inspected in the CSS

1.1.9.4. Summary of Catch Basins and Inlet Grates Cleaned in the CSS

1.2. NMC 2 Maximize Use of the Collection System for Storage

1.2.1. Diversion Structure Evaluation Study (one time with 2014 annual report)

1.2.2. Listing of any Modifications to Diversion Structures or Outfalls (provided in NMC 1)

- 1.2.3. Record of I/I Studies in CSS
- 1.3. NMC 3 Control of Non- domestic Discharges
 - 1.3.1. Summary of Pre-Treatment Program
 - 1.3.2. FOG Program documentation is provided as part of the IOCP Annual Report.
 - 1.3.3. List of Meetings with identified permitted industrial dischargers
- 1.4. NMC 4 Maximization of Flow to the POTW
 - 1.4.1. Kaw Point wet Weather Capacity Assessment (one time with 2015 annual report)
 - 1.4.2. Current Kaw Point WWTP Wet Weather Standard Operating Procedure
- 1.5. NMC 5 Combined Sewer Overflows During Dry Weather
 - 1.5.1. List of Dry Weather CSOs
 - 1.5.2. Listing of Diversion Structure Modifications (provided in section NMC 1)
- 1.6. NMC 6 Control of Solid and Floatable Material
 - 1.6.1. Record of Street Sweeping Activities in the CSS
 - 1.6.2. Record of Number of Catch Basins Cleaned in the CSS (provided in section NMC 1)
 - 1.6.3. Record of Number of Catch Basins Inspected in the CSS (provided in section NMC 1)
- 1.7. NMC 7 Develop and Implement Pollution Prevention Program(s)
 - 1.7.1. Standard Curb Inlet Manhole Detail
 - 1.7.2. Household Hazardous Waste Annual Report (Found In MS4 Compliance Report on Attached CD)
 - 1.7.3. Pollution Prevention / Good Housekeeping Measures (Found In MS4 Compliance Report on attached CD)
 - 1.7.4. Record of Street Sweeping Activities in the CSS (Provided in section NMC 1)
- 1.8. NMC 8 Public Notification and Education
 - 1.8.1. Annual Photographic Verification of CSO Signs (provided on attached CD)

1.8.2. Annual Photographic Verification of Signage at Select Boat Ramps and River Access Points Proximate to CSO Outfalls (provided on attached CD)

1.8.3. Documentation of Public Outreach Activities (Found in MS4 Compliance Report on attached CD)

1.9. NMC 9 Monitoring

1.9.1. This activity will be developed and reported as part of the IOCP development.

5.0 Summary of Scheduled NMC Activities

NMC	Description	Due
All	Annual NMCs Report	2/28/Annually
8	Install CSO information signs at select boat ramps and river access points proximate to CSO outfalls	5/30/2013
4	Hydraulic Capacity Analysis of the Kaw Point WWTP	12/31/2014
2&5	CSO Regulator Evaluation	12/31/2014
2&5	CSO Regulator Minor Enhancements as Warranted	12/31/2016
7&8	Periodically produce newsletters and pamphlets that provide the public with information on the CSS	Periodically