CITY COUNCIL WORK SESSION

Monday, December 02, 2024 at 5:00 PM

Council Chambers - 331 First Street East

AGENDA

RULES OF PROCEDURE

Workshops are not Public Hearings. No member of the public or interested party has the right to make a presentation or address the Council on an item under consideration in a workshop or a study session.

During the City Council Work Session, the Council will primarily discuss and debate items intended to be formally considered at a future City Council Meeting. However, the Council may at any noticed meeting, including a City Council Work Session meeting, take action on any item shown on the posted agenda as a potential action item. The City Council Work Session meeting is a regular meeting of the Independence City Council.

MEETING OPENING

Call the Meeting to Order

ACTION ITEM

1. Wal-Mart Supercenter #750 Liquor License Renewal

DEPARTMENT UPDATES

2. Department Report – Airport
3. Department Report – Building/Code Enforcement
4. Department Report – Streets
5. Department Report – Utilities Department

NEW BUSINESS

6. Wastewater Treatment Plant Replacement Project – Design Update
7. RV Park Discussion
8. Airport Five-Year CIP
9. Airport Stormwater Pollution Prevention Plan (SWPPP)
10. Lover's Lane – Streetlighting
11. Speed Education Devices (Signage)
12. Yard Waste Burning (IMC 105.05, Item 2B.)
13. Fiscal Year 2026 Budget Timeline
14. Finance Software Transition
15. 2025 Haz Mat Fee Update
16. ISO Report
17. Tenant Transition from Business to GCC – Office 365
18. Council Topics
19. Mayor Topics
20. City Manager Topics

ADJOURNMENT

This agenda is subject to change.

CITY COUNCIL MEMORANDUM

TO:	Matthew R. Schmitz, MPA - City Manager
FROM:	Susi Lampe, IaCMC, IaCFO – Assistant City Manager/City Clerk/Treasurer
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Wal-Mart Supercenter #750 Liquor License Renewal

BACKGROUND:

I received an email on September 21, 2024, from Iowa ABD that Wal-Mart Supercenter #750's liquor license was eligible for their renewal. I emailed this to the Building Official, Fire Department, and Police Department so they were able to start their process. On September 23, 2024, I received an email from the Building Official that the emergency lighting was inoperable, and a Walmart Manager would put in a repair ticket. On October 2, 2024, I received an email from Iowa ABD that the application was now "Submitted to Local Authority" with a tentative effective date of December 1, 2024. During this period, the Fire and Police Departments had said they approve of the renewal. The Building Official had been working with Walmart staff about the emergency lighting. On November 25, 2024, I received an email from the Building Official that the emergency lighting had been repaired. This was unable to be added to the November 25th Council agenda as it was less than 24 hours. This work session is the first meeting that it could be brought forth to Council to potentially minimize any delays of deliveries that Walmart may need to receive to continue operations.

DISCUSSION:

Typically, these are placed on the Consent Agenda and there is minimal, if any, discussion.

RESULTS:

The City has established priorities during strategic planning sessions. This item supports the Vision from that session of Engaging and Catalyzing Community.

FINANCIAL CONSIDERATION:

The City does receive a portion of the liquor license fees paid to Iowa ABD. The portion received varies depending on the business.

RECOMMENDATION:

Staff recommends the approval of the Wal-Mart Supercenter #750 Class E Retail Alcohol License renewal effective December 1, 2024, through November 30, 2025.

Item #1.

State of Iowa
Alcoholic Beverages Division

Applicant

NAME OF LEGAL ENTITY	NAME OF BUSINESS(DBA)	BUSINESS
Walmart Inc.	Wal-Mart Supercenter #750	(479) 371-8719

ADDRESS OF PREMISES	PREMISES SUITE/APT NUMBER	CITY	COUNTY	ZIP
302 Enterprise Drive SW		Independence	Buchanan	50644

MAILING ADDRESS	CITY	STATE	ZIP
702 S.W. 8th Street	Bentonville	Arkansas	72716-0500

Contact Person

NAME	PHONE	EMAIL
William Lodge	(479) 371-8719	complic@wal-mart.com

License Information

LICENSE NUMBER	LICENSE/PERMIT TYPE	TERM	STATUS
LE0001262	Class E Retail Alcohol License	12 Month	Submitted to Local Authority

TENTATIVE EFFECTIVE DATE	TENTATIVE EXPIRATION DATE	LAST DAY OF BUSINESS
Dec 1, 2024	Nov 30, 2025	

SUB-PERMITS

Class E Retail Alcohol License

PRIVILEGES

ALCOHOLIC BEVERAGES DIVISION State of Iowa

State of Iowa
Alcoholic Beverages Division

Status of Business

BUSINESS TYPE

Corporation

Ownership

- **Individual Owners**

NAME	CITY	STATE	ZIP	POSITION	% OF OWNERSHIP	U.S. CITIZEN
Sarah Little	Springdale	Arkansas	72764	Assistant Secretary	0.00	Yes
Matthew Allen	Rogers	Arkansas	72758	Assistant Treasurer	0.00	Yes
Carl Doug McMillon	Bentonville	Arizona	72712	President & CEO	0.00	Yes
Walmart Licensing						
Walmart Licensing						

Insurance Company Information

INSURANCE COMPANY

POLICY EFFECTIVE DATE

POLICY EXPIRATION DATE

DRAM CANCEL DATE

OUTDOOR SERVICE EFFECTIVE DATE

OUTDOOR SERVICE EXPIRATION DATE

ALCOHOLIC BEVERAGES DIVISION
State of Iowa

State of Iowa
Alcoholic Beverages Division

BOND EFFECTIVE DATE	TEMP TRANSFER EFFECTIVE DATE	TEMP TRANSFER EXPIRATION DATE

CITY COUNCIL
WORK SESSION
DEPARTMENT REPORT

TO:	Matthew R. Schmitz, MPA - City Manager
FROM:	Brett Soukup, Airport Director
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Department Report – Airport

Fuel Sales Update

- 100LL – 485 gal
- Jet A – 17 gal.

- Grounds:

- The Iowa (DOT) made it to the airport to pick up some of the old equipment from the lighting project. Some of these materials will go to other airports that need parts.

- Equipment:

- Working on snow equipment.
- We put in new cat 5 from the terminal building over to the fuel farm. Some of this is temporary just to make sure that this will be a success and the other stuff was put in conduit and buried and dug in by hand. The hope is this will be a better connection for the phone line and maybe it won't take as long to communicate back and forth to process credit cards.

- Miscellaneous:

- The contractor came earlier in the month and replaced the one apron sign that was ordered incorrectly.
- Bolton & Menk reported that they were able to come and do the seeding around the new lights and signs for the lighting project. I have not been able to tell, however, but we will see in the spring if anything comes up.
- Independence light and power came out and assisted me with changing some new bulbs from incandescent to (LED) on the apron this will make things so much brighter.
- The independence light and power communication side have been out a couple of different times to help with switching the Internet over to fiber installing a new cabinet and getting everything rearranged It looks so much better now. Thank you.

CITY COUNCIL
WORK SESSION
DEPARTMENT REPORT

TO:	Mattherw R. Schmitz, MPA – City Manager
FROM:	Matt Chesmore, Building Official
DATE OF MEETING:	December 2nd, 2024
ITEM TITLE:	Department Report – Building/Code Enforcement

DISCUSSION:

Building Department:

In the months of October 1, 2024, and November 30, 2024, 61 Permits were issued.

Residential: 3-Building, 1- Building Moving, 1-Decking, 1-Demolition, 2-Driveway, 2-Excavation, 1-Fence, 6-HVAC, 3-New Construction, 5-Plumbing, 1-Remodel/Addition, 6-Roofing,1-Sidewalk/Patio, 1-PV(Solar) 2-Street Excavation, 5-Water Heaters, 3-Window replacement

Commercial: 1-Building/remodel, 4-Beer/Liquor (renewal), 2-Concrete, 1-Demolition, 1-HVAC, 2-Plumbing, 3-Addition/Remodels,1-Roofing,2-Signs

Code Enforcement:

6 Letters of Violation were sent in October and November.

2 In October and 4 in November.

808 1st W – Is an ongoing 657A project; however, we have been advised that if the US Attorney requests this action be removed to Federal Court, the City's legal expense would drastically increase if the City wished to continue the action. A non-jury trial in District Court has been scheduled for January 15, 2025.

Other 657A: Staff has discussed additional abandoned properties in town that need to be remedied. We plan to schedule a closed session at the Dec. meeting to discuss these properties with the Council, including the possible litigation surrounding them.

Nuisance Property: A nuisance property located at 813 9th Street NE has been cited for violations regarding the International Property Maintenance Code and local Ordinances regarding the storing of Junk vehicles. I met with the owner (landlord) and found out she felt the City was violating her rights, stating the city had no right to regulate her "private" property. I explained that the City of Independence has adopted certain ordinances that can regulate private property as afforded by Iowa law. Once she de-escalated, she agreed to make repairs to the building but asked if the repairs could be held off until spring as she lived in Illinois, and with winter upon us, completing this type of work would be very difficult. I told her as long as she kept in contact and agreed to get the repairs completed in the spring, we would agree; however, if the work were not completed in a timely manner in the spring, then we would have no other recourse but to turn this over to our legal team and file a municipal infraction. I have scheduled a follow-up to this issue on April 1st, 2025.

She also said that she would resolve the junk car issue by either housing them in an enclosed building or having them removed.

812 10th Street NE – Derelict property

The city is currently gathering the costs incurred and will prepare to dispose of the property in the next few months.

Planning and Zoning:

The Planning and Zoning Commission met on October 1, where the Final MBH plat was approved and moved to recommend to the council they accept and approve. On November 5th, P&Z met again to discuss possible amendments to the "Signs" ordinance. The discussion was tabled until further research, information, and/or feedback could be acquired. The City of Independence currently has a moratorium on the enforcement of certain sign ordinances in certain "downtown" areas. Planning and Zoning Commission will reconvene on December 3rd, 2024, to discuss updates.

Board of Adjustments:

No Activity

Flood Plain Administration:

Hazard Mitigation Grant Program: Letters were sent out to 6 residents of Independence identified by FEMA as likely eligible for the FEMA buyout program. The context of the letter was only to survey interest in the program. Letters generated three responses, two of which were interested and one not. City staff are currently making efforts to enroll into FEMA's portal as users so that we may transfer a Notice of Intent from Buchanan County Emergency Management to the City of Independence.

The information we have received indicates that the City would be responsible for 15% of the appraised value, including land and structure. The State of Iowa Emergency Management pays 10%, with FEMA covering the remaining 75%.

The Council should also be aware prior to authorizing the procurement of appraisal services; although the appraisal fees may be included in the pre-award costs, this is a 100% voluntary program, and if a property owner should at any time decide to disenroll, the City would be responsible for the cost of the appraisal and would not be reimbursed by FEMA or the State. Appraisal fees are estimated to be between $300-$500 dollars. It is also an assumption that the newly appraised value could be approximately 10% higher than the current assessed value.

Training:

10/10/2024 Attended the Eastern Iowa Construction Code Council (EICCC) Conference. This meeting was shortened as the time allotted was mostly designated for training on the 2021 IBC requirements for apartment buildings.

All Permits issued previous 2 months - Set Date Range

File Date	Permit Number	Parcel Number	Location	Owner Name	Owner Address	Permit Type	Permit Use	Fee Amount	Permit Date
September 23, 2024	24-0331	0634463014	306 1ST ST E, INDEPENDENCE 50644	ELM TREE LLC	830 HAWLEY ST, JESUP, IA. 50648	Commercial	Beer/Liquor	$0.00	November 22, 2024
September 23, 2024	24-0287	0633452003	1640 1ST ST W, INDEPENDENCE 50644	PACHECO, JOSE MANUEL & AGUSTIN	105 HWY 151, PLATTEVILLE, WI. 53818	Commercial	Beer/Liquor	$0.00	October 4, 2024
September 23, 2024	24-0293	1004277008	117 1ST ST E, INDEPENDENCE 50644	ZINGG REAL ESTATE LLC	117 1ST ST E, INDEPENDENCE, IA. 50644	Commercial	Beer/Liquor	$0.00	October 14, 2024
September 23, 2024	24-0330	0634463022	330-A MAIN ST W, INDEPENDENCE 50644 (Bldg #24270-0001 Suite #24270-0003)	STAN DEVELOPMENT LLC	330 1ST ST E, INDEPENDENCE, IA. 50644	Commercial	Beer/Liquor	$0.00	November 22, 2024
							Subtotal For Beer/Liquor (4 Records)	$0.00	
November 14, 2024	24-0342	1004185008	608 4TH ST SW, INDEPENDENCE 50644	HEIDEMANN, TAMMARA LEA	608 4TH ST SW, INDEPENDENCE, IA. 50644	Residential	Building	$100.00	November 25, 2024
October 9, 2024	24-0291	1004340009	812 8TH AVE SW, INDEPENDENCE 50644	BUMGARNER, KAYE A	812 8TH AVE SW, INDEPENDENCE, IA. 50644	Residential	Building	$30.00	October 9, 2024
November 4, 2024	24-0317	1004406007	404 7TH ST SW, INDEPENDENCE 50644	GOINS, GORDON L & WANDA L	404 7TH ST SW, INDEPENDENCE, IA. 50644	Residential	Building	$90.00	November 4, 2024
October 24, 2024	24-0302	0634463022	330-A MAIN ST W, INDEPENDENCE 50644 (Bldg #24270-0001 Suite #24270-0003)	STAN DEVELOPMENT LLC	330 1ST ST E, INDEPENDENCE, IA. 50644	Commercial	Building	$30.00	October 25, 2024
							Subtotal For Building (4 Records)	$250.00	

File Date	Permit Number	Parcel Number	Location	Owner Name	Owner Address	Permit Type	Permit Use	Fee Amount	Permit Date
October 23, 2024	24-0303	1003377004	808 9TH AVE SE, INDEPENDENCE 50644	PIERCE, SANDRA L	808 9TH AVE SE, INDEPENDENCE, IA. 50644	Residential	Building Moving	$100.00	October 25, 2024
							Subtotal For Building Moving (1 Records)	$100.00	
November 12, 2024	24-0327	0634227007	700 13TH ST NE, INDEPENDENCE 50644	CALVARY EV ANGELISTIC CENTER	700 13TH ST NE, INDEPENDENCE, IA. 50644	Commercial	Concrete work	$58.00	November 14, 2024
October 22, 2024	24-0298	0634463008	331 2ND ST NE, INDEPENDENCE 50644	FARMERS STATE SAVINGS BANK	, INDEPENDENCE, IA. 50644-0229	Commercial	Concrete work	$58.00	October 22, 2024
							Subtotal For Concrete work (2 Records)	$116.00	
October 14, 2024	24-0299	0634416001	518 4TH AVE NE, INDEPENDENCE 50644	SCHULTES, CAROLE ANN	1000 PRAIRIE DR NE, CEDAR RAPIDS, IA. 52402	Residential	Decking	$90.00	October 23, 2024
							Subtotal For Decking (1 Records)	$90.00	
October 29, 2024	24-0315	0634279016	901 6TH AVE NE, INDEPENDENCE 50644	N & K RENTALS LLC	2037 14TH ST NE, INDEPENDENCE, IA. 50644	Commercial	Demolition	$0.00	October 30, 2024
November 5, 2024	24-0318	1004189003	401 6TH AVE SW, INDEPENDENCE 50644	ACC 215 LLC	3161 SE 22ND ST, DES MOINES, IA. 50320	Residential	Demolition	$0.00	November 5, 2024
							Subtotal For Demolition (2 Records)	$0.00	
October 28, 2024	24-0314	0634409002	117 7TH ST NE, INDEPENDENCE 50644	OHL, STEVEN J & MARY J	516 14TH AVE NE, INDEPENDENCE, IA. 50644	Residential	Driveway	$20.00	October 29, 2024

File Date	Permit Number	Parcel Number	Location	Owner Name	Owner Address	Permit Type	Permit Use	Fee Amount	Permit Date
October 21, 2024	24-0304	0634482006	311 8TH AVE NE, INDEPENDENCE 50644	BASCOM, PAMELA	311 8TH AVE NE, INDEPENDENCE, IA. 50644	Residential	Driveway	$52.00	October 25, 2024
							Subtotal For Driveway (2 Records)	$72.00	
September 27, 2024	24-0288	1004179008	211 9TH AVE SW, INDEPENDENCE 50644	PLANTED PROPERTIES 2 LLC	% ANDREW J HUDSON, INDEPENDENCE, IA. 50644	Residential	Excavation	$0.00	October 7, 2024
November 6, 2024	24-0326	1003255007	140 14TH AVE SE, INDEPENDENCE 50644	HOCKEN, JOCELYN & DECKER, TYSON	140 14TH AVE SE, INDEPENDENCE, IA. 50644	Residential	Excavation	$0.00	November 12, 2024
							Subtotal For Excavation (2 Records)	$0.00	
June 21, 2024	24-0329	1009206010	409 MATTHEW ST, INDEPENDENCE 50644	OHL CONSTRUCTION INC	2867 MICHEL AVE ROWLEY, IA 52329	Residential	Fence	$64.00	November 15, 2024
							Subtotal For Fence (1 Records)	$64.00	
October 23, 2024	24-0310	0634227007	700 13TH ST NE, INDEPENDENCE 50644	CALVARY EVANGELISTIC CENTER	700 13TH ST NE, INDEPENDENCE, IA. 50644	Commercial	Mechanical (HVAC)	$58.00	October 28, 2024
October 21, 2024	24-0336	1004379014	1015 7TH AVE SW, INDEPENDENCE 50644	SMUTZ, BRITTNY	1015 7TH AVE SW, INDEPENDENCE, IA. 50644	Residential	Mechanical (HVAC)	$58.00	November 22, 2024
October 23, 2024	24-0335	1004351006	1879 BLAND BLVD, INDEPENDENCE 50644	HICKEY, MARK J & TINA R	1879 BLAND BLVD, INDEPENDENCE, IA. 50644	Residential	Mechanical (HVAC)	$52.00	November 22, 2024
September 9, 2024	24-0309	0634280016	900 6TH AVE NE, INDEPENDENCE 50644	OPERATION THRESHOLD	300 W 3RD ST, INDEPENDENCE, IA. 50644	Residential	Mechanical (HVAC)	$0.00	October 28, 2024

File Date	Permit Number	Parcel Number	Location	Owner Name	Owner Address	Permit Type	Permit Use	Fee Amount	Permit Date
October 17, 2024	24-0338	1003376005	821 8TH ST SE, INDEPENDENCE 50644	HALLBERG, CORY C & MIRANDA L	821 8TH ST SE, INDEPENDENCE, IA. 50644	Residential	Mechanical (HVAC)	$82.00	November 22, 2024
October 15, 2024	24-0305	1004340008	805 7TH AVE SW, INDEPENDENCE 50644	SMITH, COLLEEN K	805 7TH AVE SW, INDEPENDENCE, IA. 50644	Residential	Mechanical (HVAC)	$70.00	October 25, 2024
September 25, 2024	24-0339	1004432002	506 3RD AVE SE, INDEPENDENCE 50644	SCHEETZ, DONALD C	218 2ND AVE NE, INDEPENDENCE, IA. 50644	Residential	Mechanical (HVAC)	$118.00	November 22, 2024
							Subtotal For Mechanical (HVAC) (7 Records)	$438.00	
November 12, 2024	24-0332	1009203010	1401-1 KELLIE AVE, INDEPENDENCE 50644	INDEPENDENCE CONSTRUCTION INC	115 1ST ST E, INDEPENDENCE, IA. 50644	Residential	New Construction	$1,281.00	November 22, 2024
November 12, 2024	24-0334	1009206008	405 MATTHEW ST, INDEPENDENCE 50644	INDEPENDENCE CONSTRUCTION INC	115 1ST ST E, INDEPENDENCE, IA. 50644	Residential	New Construction	$1,281.00	November 22, 2024
November 12, 2024	24-0333	1009206009	407 MATTHEW ST, INDEPENDENCE 50644	INDEPENDENCE CONSTRUCTION INC	115 1ST ST E, INDEPENDENCE, IA. 50644	Residential	New Construction	$1,191.00	November 22, 2024
							Subtotal For New Construction (3 Records)	$3,753.00	
September 25, 2024	24-0344	0635330004	406 13TH AVE NE, INDEPENDENCE 50644	STELTER, SAMANTHA J	406 13TH AVE NE, INDEPENDENCE, IA. 50644	Residential	Plumbing	$28.00	November 25, 2024
September 10, 2024	24-0308	1004379015	1017 7TH AVE SW	WEBB, ALEXANDER W	1017 7TH AVE SW, INDEPENDENCE, IA. 50644	Residential	Plumbing	$30.00	October 28, 2024
July 12, 2024	24-0283	1003309001	500 6TH AVE SE, INDEPENDENCE 50644	MIDWEST DEVELOPMENT CO	% SKOGMAN COMPANIES	Residential	Plumbing	$0.00	October 1, 2024

File Date	Permit Number	Parcel Number	Location	Owner Name	Owner Address	Permit Type	Permit Use	Fee Amount	Permit Date
October 21, 2024	24-0337	0635310009	812 4TH ST NE, INDEPENDENCE 50644	HEEREN, MICHAEL	812 4TH ST NE, INDEPENDENCE, IA. 50644	Residential	Plumbing	$46.00	November 22, 2024
September 12, 2024	24-0307	1004380005	614 BLAND BLVD SW, INDEPENDENCE 50644	BERGERSON, THOMAS R & LINDA J	614 BLAND BLVD SW, INDEPENDENCE, IA. 50644	Residential	Plumbing	$28.00	October 28, 2024
September 26, 2024	24-0306	0635452008	1616 1ST ST E, INDEPENDENCE 50644	PEOPLES MEMORIAL HOSPITAL OF BUCHANAN COUNTY	1600 1ST ST E, INDEPENDENCE, IA. 50644	Commercial	Plumbing	$24.00	October 28, 2024
October 9, 2024	24-0294	1004178010	601 1ST ST W, INDEPENDENCE 50644	BEYOND THE MIRROR LLC	401 14TH AVE SE, INDEPENDENCE, IA. 50644	Commercial	Plumbing	$46.00	October 15, 2024
							Subtotal For Plumbing (7 Records)	$202.00	
October 24, 2024	24-0300	0634462009	200 1ST ST E, INDEPENDENCE 50644	SPARRGROVE ENTERPRISES LLC	21515 310TH ST, PARKERSBURG, IA. 50665	Commercial	Remodel/Addition	$0.00	October 24, 2024
November 22, 2024	24-0341	1004277011	201 1ST ST E, INDEPENDENCE 50644	WIELAND DEVELOPMENT LLC	PO BOX 243, WINTHROP, IA. 50682-0243	Commercial	Remodel/Addition	$106.00	November 22, 2024
October 15, 2024	24-0296	1004405008	615 5TH AVE SW, INDEPENDENCE 50644	WYGANT, KELLY L &CHRISTOPHER; B	615 5TH AVE SW, INDEPENDENCE, IA. 50644	Residential	Remodel/Addition	$58.00	October 18, 2024
July 30, 2024	24-0289	1005277006	1401 1ST ST W, INDEPENDENCE 50644	MOSER, CHAD W & CANDY J	205 2ND ST SE, INDEPENDENCE, IA. 50644	Commercial	Remodel/Addition	$100.00	October 7, 2024
							Subtotal For Remodel/Addition (4 Records)	$264.00	
October 18, 2024	24-0324	1003159009	315 5TH AVE SE, INDEPENDENCE 50644	DOWNS, NATHAN	1707 HUNTINGTON RD, WATERLOO, IA. 50701	Residential	Roofing	$29.00	November 7, 2024

File Date	Permit Number	Parcel Number	Location	Owner Name	Owner Address	Permit Type	Permit Use	Fee Amount	Permit Date
October 18, 2024	24-0295	1003159008	311 5TH AVE SE, INDEPENDENCE 50644	DOWNS, NATHAN E	1707 HUNTINGTON RD, WATERLOO, IA. 50701	Residential	Roofing	$29.00	October 18, 2024
October 3, 2024	24-0285	0634435008	700 6TH ST NE, INDEPENDENCE 50644	ESCH, BRADLEY M	700 6TH ST NE, INDEPENDENCE, IA. 50644	Residential	Roofing	$154.00	October 4, 2024
October 15, 2024	24-0297	0635101011	1100 12TH ST NE, INDEPENDENCE 50644	WASTE MANAGEMENT OF IOWA INC	, CHICAGO, IL. 60690-1450	Commercial	Roofing	$160.00	October 18, 2024
November 6, 2024	24-0323	0633476007	1201 OBRIEN CT, INDEPENDENCE 50644	LORENZEN, RANDAL L & LISA L	1201 O'BRIEN COURT NW, INDEPENDENCE, IA. 50644	Residential	Roofing	$90.00	November 7, 2024
October 7, 2024	24-0290	1003156007	506 3RD ST SE, INDEPENDENCE 50644	BEATTY, SHANE M & MOLLY J	1771 GOLF COURSE BLVD #6, INDEPENDENCE, IA. 50644	Residential	Roofing	$64.00	October 7, 2024
October 11, 2024	24-0292	1009227006	1948 LOVERS LANE BLVD, INDEPENDENCE 50644	STREIF, THOMAS A & SHERRY L	1948 LOVERS LANE BLVD, INDEPENDENCE, IA. 50644	Residential	Roofing	$100.00	October 11, 2024
							Subtotal For Roofing (7 Records)	$626.00	
November 12, 2024	24-0325	1003309001	500 6TH AVE SE, INDEPENDENCE 50644	MIDWEST DEVELOPMENT CO	% SKOGMAN COMPANIES, CEDAR RAPIDS, IA. 52401	Residential	Sidewalk/Patio	$0.00	November 12, 2024
							Subtotal For Sidewalk/Patio (1 Records)	$0.00	
October 1, 2024	24-0286	0633351012	1900 1ST ST W, INDEPENDENCE 50644	WAT PROPERTIES LLC	1009 TANGLEWOOD DR, MANCHESTER, IA. 52057	Commercial	Sign	$76.00	October 1, 2024

File Date	Permit Number	Parcel Number	Location	Owner Name	Owner Address	Permit Type	Permit Use	Fee Amount	Permit Date
October 23, 2024	24-0301	0634360001	115 6TH AVE NW, IN DEPENDENCE 50644	FIRST PRESBYTERIAN UNITED CHURCH	115 6TH AVE NW, IN DEPENDENCE, IA. 50644	Commercial	Sign	$172.00	October 25, 2024
							Subtotal For Sign (2 Records)	$248.00	
November 5, 2024	24-0319	1009403004	304 ENTERPRISE CT SW, INDEPENDENCE 50644	PR HERITAGE DEVELOPMENT LLC & BC HEARTLAND LLC	1770 OREGON PIKE, LANCASTER, PA. 17601	Residential	Solar Panel	$100.00	November 6, 2024
							Subtotal For Solar Panel (1 Records)	$100.00	
October 28, 2024	24-0320	1004330004	609 9TH AVE SW, IN DEPENDENCE 50644	DODGE, BENJAMIN H & ELISSA C	609 9TH AVE SW, IN DEPENDENCE, IA. 50644	Residential	Street Excavation	$0.00	November 6, 2024
October 28, 2024	24-0321	1004189001	615 4TH ST SW, INDEPENDENCE 50644	HEIDEMANN, RUSSELL LEE & TAMMARA LEA	615 4TH ST SW, INDEPENDENCE 50644	Residential	Street Excavation	$0.00	November 6, 2024
							Subtotal For Street Excavation (2 Records)	$0.00	
October 14, 2024	24-0312	1003154006	713-B 1ST ST E, INDEPENDENCE 50644	ASPEN RENTALS LLC	1208 1ST ST W, SUITE 3, INDEPENDENCE, IA. 50644	Residential	Water Heater	$24.00	October 28, 2024
November 7, 2024	24-0343	1003328007	307 TERRACE DR, INDEPENDENCE 50644	CAREY, JONATHAN P & BROOK A	307 TERRACE DR SE, INDEPENDENCE, IA. 50644	Residential	Water Heater	$32.00	November 25, 2024
October 27, 2024	24-0316	0635337002	1504 7TH ST NE, INDEPENDENCE 50644	WEIS, WADE E & HEIDI L	1504 7TH ST NE, INDEPENDENCE, IA. 50644	Residential	Water Heater	$20.00	November 4, 2024
September 25, 2024	24-0313	1004256003	214 5TH AVE SW, IN DEPENDENCE 50644	KAUFMAN, KEVIN L & SONIA V	214 5TH AVE SW, IN DEPENDENCE, IA. 50644	Residential	Water Heater	$24.00	October 28, 2024

File Date	Permit Number	Parcel Number	Location	Owner Name	Owner Address	Permit Type	Permit Use	Fee Amount	Permit Date
October 16, 2024	24-0311	0634482009	710 3RD ST NE, INDEPENDENCE 50644	BUNDY, ROBERT T	708 TUSCANY CT NE, CEDAR RAPIDS, IA. 52402	Residential	Water Heater	$24.00	October 28, 2024
							Subtotal For Water Heater (5 Records)	$124.00	
September 23, 2024	24-0284	1003305001	500 4TH AVE SE, INDEPENDENCE 50644	HACK, RAYMOND H & KATHIE L	500 4TH AVE SE, INDEPENDENCE, IA. 50644	Residential	Window Replacement	$76.00	October 3, 2024
November 20, 2024	24-0340	0634190003	815 1ST AVE NE, INDEPENDENCE 50644	STRAW, RONALD R & THERESA L	815 1ST AVE NE, INDEPENDENCE, IA. 50644	Residential	Window Replacement	$58.00	November 22, 2024
November 5, 2024	24-0322	0635158006	808 8TH ST NE, INDEPENDENCE 50644	WIEST, KRYSTLE K	808 8TH ST NE, INDEPENDENCE, IA. 50644	Residential	Window Replacement	$82.00	November 6, 2024
							Subtotal For Window Replacement (3 Records)	$216.00	
							T O T A L - 61 Records	$6,663.00	

All Violations last two months - Set Date Range

Parcel Number	Violation Type	Inspector	Violation Status	Violation Date	Violation Status	Owner Address
0635301001	Code Enforcement	Matt Chesmore	Violation Notice Sent	October 4, 2024	Violation Notice Sent	800 1ST AVE NE, INDEPENDENCE, IA. 50644
1004257007	Administrative	Matt Chesmore	Open	October 21, 2024	Open	215 3RD AVE SW, INDEPENDENCE, IA. 50644
0634458013	Code Enforcement	Matt Chesmore	Violation Notice Sent	November 13, 2024	Violation Notice Sent	211 3RD AVE NE, INDEPENDENCE, IA. 50644
0634310004	Code Enforcement	Matt Chesmore	Violation Notice Sent	November 13, 2024	Violation Notice Sent	2130 MT VERNON RD SE, CEDAR RAPIDS, IA. 52403
0634312003	Administrative	Matt Chesmore	Violation Notice Sent	November 15, 2024	Violation Notice Sent	604 6TH AVE NW, INDEPENDENCE, IA. 50644
0635158003	Code Enforcement	Matt Chesmore	Violation Notice Sent	November 22, 2024	Violation Notice Sent	12 N OAKLAND DR, CASEYVILLE, IL. 62232

6 Violations

CITY COUNCIL
WORK SESSION
DEPARTMENT REPORT

TO:	Matthew R. Schmitz, MPA - City Manager
FROM:	Brad Esch, Street Superintendent
DATE OF MEETING:	December 2 2024
ITEM TITLE:	Department Report – Streets

Fall leaf sweeping and vac in streets, intakes, and areas in parks.

Holiday decorations, Christmas tree going up soon.

Sign repair and replaced.

Fall/Winter truck oil changes, dump trucks, plows, snow removal equipment inspections performed and ready for winter.

Concrete street paving/ asphalt overlays. Blacktop pothole cold patching.

All the dead trees were removed from the Oakwood Cemetery and some other dead/dangerous large trees around town working with Light and Power.

Several small projects working together with the parks dept.

Routine maintenance at tree dump.

House demolition at 812 10th St. NE. Hauled debris to Waste Management. Backfilled caped water and sewer. Rough graded lot and seeded.

CITY COUNCIL
WORK SESSION
DEPARTMENT REPORT

TO:	Matthew R. Schmitz, MPA - City Manager
FROM:	Travis Foley – Utilities Department Director
DATE OF MEETING:	December 02, 2024
ITEM TITLE:	Department Report – Utilities Department

Water –

- All our collected data for the lead service line inventory has been submitted to the DNR. This is something we will continue to work on and gather information to eliminate any unknowns. As for now, there are no upcoming deadlines, but we are wanting to continue gathering as much information as possible for our own records and to be ready for when another phase of requirements do come out.
- The water project on 8th Ave NE has been completed. We were able to replace almost 300 feet of water main. The goal in the next two years is to replace the rest of the water main on 8th Ave from 5th St to the railroad tracks just north of 10th St.

Sewer –

- We are getting close to finishing the project that developed after the discovery of the sewer main on 1st St East. We are working on relocating the final few lines that were connected to the old main. Once these are relocated, we are planning to fill the old line with flowable concrete to insure no more issues occur in the future.

Wastewater –

- We continue to meet with Strand as they progress with the design of the new wastewater plant.
- Staying busy with regular maintenance of process equipment etc.

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	City Council
FROM:	Matthew R. Schmitz, MPA - City Manager
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Wastewater Treatment Plant Replacement Project – Design Update

DISCUSSION:

Staff from Strand Associates will be present to give Council an update on the schedule for the Wastewater Treatment Plant and answer any questions the Council may have at this time.

Additional information from Strand has been provided on the attached pages.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

City of Independence
Wastewater Treatment Plant Design Modifications
Design Progress Report by Strand Associates
December 2, 2024 Workshop

Anticipated Project Schedule

*November 8, 2024 - Drawings and Specifications Submitted to Iowa DNR for Review/Approval

*Mid-December, 2024 - Facilities Plan and Anti-Degradation Analysis to be submitted to IDNR.

*March-May, 2025 - Anticipated Iowa DNR Approval of Submitted Documents

*May, 2025 - Advertise Project for Bids

*June, 2025 - Bid Opening

*July, 2025 - City Awards Project to Lowest Responsible Bidder

*August, 2025 - Construction Contract Signed and Notice to Proceed Issued to Contractor

*August, 2025 - Construction Begins

*May, 2028 - Construction Complete (2 year-9 month estimated construction period)

Questions from City Council/Staff?

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	City Council
FROM:	Matthew R. Schmitz, MPA - City Manager
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	RV Park Discussion

DISCUSSION:

After the public comment at the November 25th City Council Regular Meeting, the Council asked for this item to be added to the agenda so that they and Staff can discuss the current situation of the RV Park and its cleanliness, as well as future plans for policies related to the RV Park, when the RV Park should be open, etc.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	Matthew R. Schmitz, MPA - City Manager
FROM:	Brett Soukup – Airport Director
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Airport Five-Year CIP

DISCUSSION:

The Airport Board has recommended sending this item to the City Council for review for the next five-year projected Capital Improvement Plan for the Airport. The Airport has discretionary funds provided by the Federal Aviation Administration (FAA) available for projects listed on this plan. In FY2025 and FY2026, the FAA is offering a 95/5 split on projects rather than the typical 90/10 split.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

Iowa Department of Transportation
Form 291112wd (09-13)

FIVE-YEAR AIRPORT CAPITAL IMPROVEMENT PROGRAM (CIP)

Airport Name: Independence Municipal Airport (IIB)
Prepared By: Bolton & Menk Inc.
Date Prepared: Draft for FAA Review 11-2-2024
Telephone:
Date Approved:

Available Entitlement Funds		$ 312,482	$ 462,482	$ 600,000	$ 600,000	$ 435,000	$ 150,000
Available BIL Funds		$ 494,000	$ 508,400				
Project Description	**Funding Source**	**FY 2025 (Go Letter)**	**FY 2026**	**FY 2027**	**FY 2028**	**FY 2029**	**FY 2030**
Snow Removal Equipment - Tractor, Snow Blower, Loader and Box Blade	**Federal**	$ -	$ -	$ -	$ -	$ -	$ -
	BIL	$ -	$ 451,250.00	$ -	$ -	$ -	$ -
	State	$ -	$ -	$ -	$ -	$ -	$ -
	Local	$ -	$ 23,750.00	$ -	$ -	$ -	$ -
	Total	$ -	$ 475,000.00	$ -	$ -	$ -	$ -
Airport Master Plan/ALP	**Federal**	$ -	$ -	$ -	$ 315,000.00	$ -	$ -
	BIL	$ -	$ -	$ -	$ -	$ -	$ -
	State	$ -	$ -	$ -	$ -	$ -	$ -
	Local	$ -	$ -	$ -	$ 35,000.00	$ -	$ -
	Total	$ -	$ -	$ -	$ 350,000.00	$ -	$ -
Rehabilitate Runway (Joint Sealing, Crack Sealing & Patching) LCD 2007, 2008 Combine with other Rehab Projects into a single funded FAA project	**Federal**	$ -	$ -	$ -	$ -	$ 360,000.00	$ -
	BIL	$ -	$ -	$ -	$ -	$ -	$ -
	State	$ -	$ -	$ -	$ -	$ -	$ -
	Local	$ -	$ -	$ -	$ -	$ 40,000.00	$ -
	Total	$ -	$ -	$ -	$ -	$ 400,000.00	$ -
Rehabilitate Parallel Taxiway (Joint Sealing, Crack Sealing & Patching) LCD 2009 Combine with other Rehab Projects into a single funded FAA project	**Federal**	$ -	$ -	$ -	$ -	$ 315,000.00	$ -
	BIL	$ -	$ -	$ -	$ -	$ -	$ -
	State	$ -	$ -	$ -	$ -	$ -	$ -
	Local	$ -	$ -	$ -	$ -	$ 35,000.00	$ -
	Total	$ -	$ -	$ -	$ -	$ 350,000.00	$ -
Rehabilitate Apron Pavement (Joint Sealing, Crack Sealing & Patching) LCD 2007, 2008, 2010 Combine with other Rehab Projects into a single funded FAA project	**Federal**	$ -	$ -	$ -	$ -	$ 300,000.00	$ -
	BIL	$ -	$ -	$ -	$ -	$ -	$ -
	State	$ -	$ -	$ -	$ -	$ -	$ -
	Local	$ -	$ -	$ -	$ -	$ 33,333.00	$ -
	Total	$ -	$ -	$ -	$ -	$ 333,333.00	$ -
Wildlife Study (Iowa DOT Funded)	**Federal**	$ -	$ -	$ -	$ -	$ -	$ -
	BIL	$ -	$ -	$ -	$ -	$ -	$ -
	State	$ -	$ -	$ -	$ -	$ -	$ 34,000.00
	Local	$ -	$ -	$ -	$ -	$ -	$ 6,000.00
	Total	$ -	$ -	$ -	$ -	$ -	$ 40,000.00
	Federal	$ -	$ -	$ -	$ -	$ -	$ -
	BIL	$ -	$ -	$ -	$ -	$ -	$ -
	State	$ -	$ -	$ -	$ -	$ -	$ -
	Local	$ -	$ -	$ -	$ -	$ -	$ -
	Total	$ -	$ -	$ -	$ -	$ -	$ -
Available Entitlement Funds		$ 312,482	$ 462,482	$ 600,000	$ 285,000	$ -	$ 150,000
Available BIL Funds		$ 494,000	$ 57,150				

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	Matthew R. Schmitz, MPA - City Manager
FROM:	Brett Soukup – Airport Director
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Airport Stormwater Pollution Prevention Plan (SWPPP)

DISCUSSION:

This document needs to be updated for the City to close out the North Apron project and for the city to comply with regulations regarding stormwater runoff. It will also need to be submitted to the DNR.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

BOLTON & MENK

Real People. Real Solutions.

October 18, 2024

Storm Water Pollution Prevention Plan

City of Independence, Iowa

0T5.127670

Prepared by:
Bolton & Menk, Inc.
1519 Baltimore Drive
Ames, Iowa 50010
P: 515-233-6100
F: 515-233-4430

Certification

Storm Water Pollution Prevention Plan

Independence Municipal Airport
City of Independence, Iowa

0T5.127670

October 18, 2024

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 gathered and evaluated 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.

Name	Signature	Date

Title

Table of Contents

Appendix

I. Introduction

A. Background and Objectives

This Storm Water Pollution Prevention Plan (SWPPP) has been prepared for the Independence Municipal Airport, located along 230th St, on the east side of Independence, Iowa.
This SWPPP has been prepared in accordance with the requirements of the general permit. The SWPPP is a dynamic document. It should be revised to reflect relevant changes at the facility, whenever they occur. This will ensure that the facility remains effective in preventing storm water pollution.

B. Plan Organization

Elements discussed in this SWPPP, as specified by the general permit, are as follows:

- Pollution Prevention Team: The members and responsibilities of the Pollution Prevention Team are summarized in Section II. (Worksheet 1 in Appendix C)
- Site Map: A comprehensive map of the facility is presented in Appendix K. The items shown on the map are discussed in Section III.
- Materials Inventory: Materials used at the facility are listed in Section IV. From this list, materials that may potentially be exposed to storm water are identified. Locations of materials typically exposed to storm water are shown on the facility site map.
- Spills and Leaks: Significant spills or leaks at the facility in the three years prior to the effective date of the general permit are addressed in Section V. (Appendix E)
- Non-Storm Water Discharges: Assessment and certification of the absence of non-storm water discharges is provided in Section VI. (Appendix D)
- Existing Storm Water Data: Historic storm water sampling data are discussed in Section VII.
- Pollutant Source Identification: Based on the findings of the previous sections, potential storm water pollution sources are identified in Section VIII.
- Measures and Controls: Management practices used by the facility to minimize storm water pollution are documented in Section IX. Elements of the employee training program and record keeping and reporting requirements are also highlighted.
- Site Compliance Evaluation: Members of the Pollution Prevention Team identified in Section II will be responsible for conducting the annual site inspection. This inspection will note any modifications or changes to the physical structures and/or operational practices at the facility, as described in Section X. (Appendix F)
- Monitoring Requirements: Requirements for the location, frequency, qualifying storm event, sample type, and parameters are discussed in Section XI.

Completed relevant IDNR Worksheets are included in the above sections as listed, wherever applicable. Information entered in these worksheets formed the foundation for development of this SWPPP.

C. Plan Certification

The general permit requires that the ranking official or a duly authorized representative sign all reports, certifications, or information required to be maintained on-site by the facility. The certifications for this SWPPP are the Facility Certification provided at the beginning of the SWPPP and Non-storm Water Discharge Assessment and Certification (Worksheet 6) in Appendix D.

D. Access to the Plan

The SWPPP report is available upon request of the Iowa Department of Natural Resources Director, or authorized representative, or Regional Administrator of the U.S. EPA, as required by the general permit. Similarly, the report is available to the public pursuant to requirements of Section 308(b) of the Clean Water Act. Copies of the report are also maintained onsite, available upon request.

E. Plan Amendments

Pursuant to Part III, Section C(3) of the General Permit, the SWPPP may be amended whenever there is a change in construction, operation, or maintenance activities, which have significant effect on the potential for discharge of pollutants to the waters of the United States. In addition, the SWPPP may be amended if it proves to be ineffective in eliminating or significantly minimizing pollutants from sources identified in the SWPPP, or otherwise achieving the general objectives of controlling pollutants in storm water discharges associated with industrial activity.
Part III, Section C(2)c states that the Department may notify the permittee at any time that the SWPPP does not meet one or more of the minimum requirements of the Plan. Within 30 days of such notification from the Department, the permittee shall make the required changes to the SWPPP and shall submit to the Department a written certification that the requested changes have been made.

II. Pollution Prevention Team

The Pollution Prevention Team is responsible for ensuring that the Independence Municipal Airport complies with the various elements of this SWPPP. The team consists of one leader and one employee of the facility. Worksheet 1 in Appendix C identifies the team members and their responsibilities.

III. Site Map

The site is located in 1684 230th St, Independence, IA 50644. The site map in Appendix K is prepared in accordance with the general permit guidelines. Salient features of the map are discussed below.

A. Structures

The structures at the facility include the following:

- Refueling Area
- North Apron
- South Apron
- Aircraft Storage Hangars (T-Hangars & Box Hangars)
- Aircraft Maintenance Hangar
- Runway
- Taxiway
- Parking Lot
- Airport Terminal
- Septic Tanks
- Snow Removal Equipment (SRE) Building
    - Oil Water Separator (OWS) Tank
    - Sand & Sediment Interceptor

B. Paved/Unpaved Areas

A driveway runs north to south along the eastern side of the site. The driveway connects north, east, and south of the site. The north connection goes into the north apron. The east connection leads to the terminal parking lot north of the airport terminal. The south connection leads to the south apron, hangars, and SRE building. The runway, taxiway, aprons, refueling area, parking lot, and driveway are all paved surfaces.

C. Drainage Patterns & Storm Water Conveyances

The site generally drains west towards an unnamed tributary that empties into Lime Creek which flows into the Cedar River.

D. Operations

Except for site maintenance equipment and the above ground fuel tank, all other materials are stored indoors or underground. The refueling area is outside on a section of the airport apron. Maintenance of all of the airplanes occurs inside of the hangars. Airplanes are stored on the apron temporarily and stored inside of a hangar for longer term storage. The ground maintenance equipment is all maintained inside the storage building.

All equipment is warehoused to protect it against inclement weather, dust, or damage by vehicles. Spare parts are warehoused until used.

IV. Materials Inventory

A. General

A summary of materials used at the Independence Municipal Airport and their potential for contact with storm water are discussed in the sections below. Significant materials exposed to storm water are identified. Safe storage practices and material handling activities will greatly reduce the potential for stormwater contamination. This plan identifies areas where materials are potentially exposed to stormwater and provides strategies to eliminate the risk of any exposure. Worksheets 3 and 4, found in Appendix I, should be used to inventory the significant materials on site and their exposure to stormwater runoff.

B. Chemical/Materials on Site

1. Chemicals/Oils Stored at the Facility

Airplane fuel is stored in underground tanks near the airport apron. Maintenance equipment fuel is stored in above ground tanks near the SRE building. Transmission fluid, coolant, and other various aircraft chemicals are stored within the maintenance hangar and storage hangars. Any spills shall be cleaned up immediately with quick-dry.

2. Oil-Filled Mechanical Equipment

The following is the oil-filled equipment located on site: snow removal equipment and aircraft.

3. Oil-Filled Electrical Equipment

The site has no oil-filled electrical equipment on site.

C. Waste Materials

1. Aircraft maintenance will generate waste chemicals/oils. The waste chemicals will be properly stored and then transported offsite to be properly disposed of. The SRE building has a trench drain, a sand & sediment interceptor, and an oil water separator. All of these structures will retain sediment and oil that shall be vacuumed out biannually. The septic tanks shall be pumped out every 3 years.

D. Solid Waste

General trash and dirty cardboard are placed in a dumpster. The dumpster is stored indoors and is collected regularly by a third-party vendor. Any materials that have leaked or blown out of the dumpster during transfer shall be cleaned up immediately.

E. Section 313 Chemicals

There are no Section 313 chemicals at the facility.

F. Vehicle and Equipment Cleaning

Vehicle and/or equipment cleaning is conducted within the maintenance hangar and maintenance equipment storage building.

G. Container/Parts Storage

The facility does not store any drums or totes outdoors.

H. Roof Equipment

The facility does not have any equipment located on any of the roofs.

V. Spills and Leaks

No spills have occurred at the facility. Any reportable spills or releases must be identified on Worksheet 5 and placed in Appendix E.

VI. Non-Storm Water Discharges

Certification as to the absence of non-storm water discharges from the facility is provided in Worksheet 6 located in Appendix D. This certification is provided by the management of the Independence Municipal Airport based on performance of the following:

- Review of construction drawings and piping schematics
- Visual inspections of all drainage areas, catch basins, manholes, and ditches for flow during dry weather

VII. Existing Storm Water Data

There are no storm water sampling data available for this facility.

VIII. Pollutant Source Identification

Potential storm water pollution sources at the Independence Municipal Airport are discussed in this section. Also listed are the existing management practices at the facility and the Best Management Practices (BMPs) that will be implemented to eliminate or minimize storm water pollution problems. Salient features and potential pollution problems associated with each source are described below.

A. Outdoor Storage Areas

There is no potential for stormwater contact with outdoor storage areas as the site dumpster is stored indoors.

B. Outdoor Material Transfer

The only material transferred outdoors is the fuel for the snow removal & groundskeeping equipment and aircraft fuel. Stormwater will only come into contact with this substance if a spill is to occur. If a spill occurs, the spill shall be immediately cleaned up utilizing quick-dry.

C. Roof Equipment

There is no roof equipment located at this facility.

IX. Measures and Controls

This section presents a summary of the existing storm water management practices in place at the Independence Municipal Airport. Also included is a description of BMPs to be implemented at the facility. Guidelines for instituting an employee training program and procedures to be followed for record keeping and reporting are also provided in this section.

A. Existing Management Practices

Existing storm water management practices at the facility fall into the following categories:

- Good Housekeeping and Materials Management
- Preventive Maintenance
- Spill Prevention and Response Procedures
- Visual Inspections
- Sediment and Erosion Control
- Activity- and Site-specific BMPs

Specific practices under each of these categories are discussed below.

1. Good Housekeeping and Materials Management

   Existing good housekeeping and materials management practices include the following:

   - Facility areas exposed to storm water are kept clean and free of debris and trash.
   - All spills are promptly cleaned up.

2. Preventive Maintenance

   Periodically inspect the underground and above ground fuel storage tanks. Inspect any and all chemical/oil containers to ensure there are no leaks. Inspect all floor drains in the hangars to ensure there is no chemical runoff. Vacuum and clean out floor drains if/when they become filled or dirty. Periodically inspect hangars to ensure that long term storage aircraft are not leaking chemicals/oils. Pump out septic tanks every 3 years. Annually vacuum out the oil water separator and the sand & sediment interceptor.

3. Spill Prevention and Response Procedures

   Specific response protocols are in place at the facility for spills or leaks that may occur. Employees are trained to immediately clean up any spilled materials inside and outside the facility.

4. Visual Inspections

   Visual inspections are performed at the facility per the SWPPP Plan.

5. Sediment and Erosion Control

   The majority of the facility is landscaped with grass and vegetative cover to prevent erosion and sedimentation. Driveways and access roads are paved to prevent erosion.

6. Activity and Site-Specific BMPs

   No activity or site-specific BMPs are currently required, other than those listed above.

B. Best Management Practice Options

This section presents additional BMPs deemed appropriate for the Independence Municipal Airport. They are organized as follows:

- Good Housekeeping and Materials Management
- Preventive Maintenance
- Spill Prevention and Response Procedures
- Visual Inspections
- Sediment and Erosion Control
- Activity- and Site-specific BMPs

1. Good Housekeeping and Materials Management

   Continue to store garbage dumpster indoors. Continue to store outdoor and groundskeeping equipment in the storage garage or maintenance hangar.

2. Preventive Maintenance

   All storm water collection and conveyance structures will be inspected and cleaned, as required, after storm events. Debris or other blockages will be removed.

3. Spill Prevention and Response Procedures

   There is no additional Spill Prevention and Response Procedures BMP Options considered here beyond what is already outlined in Section IX.A.3.

4. Visual Inspections

   Annual inspections of all storm water collection and conveyance structures and discharge points will be conducted to assess their condition. Any necessary repairs will be scheduled and corrected. The annual inspections will also address the effectiveness of housekeeping measures, material handling practices, and preventive maintenance controls. During these inspections, methods of improvement of these measures will be considered.
   During these inspections of the facility grounds, any items that could impact the quality of storm water will be cleaned up. Trash and other debris will be removed from the area and properly disposed. Any spills on the property will be cleaned up immediately with absorbent material.
   Annual visual inspections will be documented on forms such as the one presented in Appendix F.

5. Sediment and Erosion Control

   The unpaved areas of the facility will be maintained with vegetation (grass) and gravel (rock) to minimize erosion.

6. Activity- and Site-specific BMPs

   The BMPs recommended to be employed at the facility:
   - Maintain all stored equipment to prevent stormwater contamination.

C. Management of Section 313 Chemicals

There are no Section 313 chemicals on site in significant quantities.

D. Management of Runoff

There is no additional runoff management at the facility.

E. Employee Training

General Permit No. 1 requires annual training for general employees and those whose jobs could impact storm water discharges. Annual training will be conducted per the training procedure listed below and in the following sections, and listed in Appendix H. Employee training may be conducted in conjunction with other required training. A record of training classes and the personnel attending will be kept in Appendix H of the plan.
Annual employee training program topics will include the following:

- Good Housekeeping:
  - Review and demonstrate basic cleanup procedures
  - Indicate proper disposal methods and locations
  - Inform employees where routine clean-up equipment is located
- Spill Prevention and Response
  - Identify potential spill areas and drainage routes
  - Familiarize employees with emergency contacts and telephone numbers
  - Practice on spill clean-up procedures
  - Familiarize employees with the locations of spill clean-up equipment and the persons responsible for operating the equipment
- Materials Handling and Storage:
  - Ensure employees are aware which materials are hazardous and where those materials are stored
  - Point out container labels
  - Tell employees to use the oldest materials first
  - Explain recycling practices

Periodic employee meetings will cover the following items:

- Any environmental or health & safety incidents
- Upcoming training sessions
- Brief reminders on good housekeeping, spill prevention and response procedures, and material handling practices
- Any new management procedures or other changes to the SWPPP

F. Record Keeping and Reporting

The general permit requires that information on incidents such as spills or other discharges be included in the records. Inspections and maintenance activities will be documented and recorded in the SWPPP.

1. Record keeping and Reporting Procedures for Spills, Leaks and Other Discharges

The Iowa Department of Natural Resources defines "reportable quantity" as "a discharge of a regulated substance to the environment in sufficient quantity to harm or threaten to harm the public health, safety, welfare, property, or natural resources of the state, or a regulated substance discharged in a quantity reportable according to the provisions of SARA, Title III, Sec 304 (1986)." These rules define any petroleum or petroleum substance as a regulated substance. A responsible person must report a known discharge of a regulated substance to the department within 6 hours if any one of the following conditions exists:

- The discharge threatens or is in a position to threaten the waters of the state (surface water or ground water);
- The discharge causes an immediate danger to human health or safety;
- The discharge causes a sheen on surface water;
- The discharge harms or threatens to harm wildlife or aquatic life;

The responsible person (Pollution Prevention Team Member) must telephone the Environmental Emergency Reporting Hotline Number 515-725-8694 as soon as they become aware of the release. (See Reporting Guide on Following Page)
If surface water or wetlands are impacted by the release of a regulated substance, the responsible person must also immediately notify the U.S. Environmental Protection Agency (EPA). EPA can be contacted by calling the National Response Center (NRC) at 800-424-8802.

2. Record keeping and Reporting Procedures for Inspections and Maintenance Activities

Maintaining records for all inspections is an important element of this SWPPP. Documenting all inspections, whether routine or detailed, is a good preventive maintenance technique because analysis of inspection records allows for early detection of any potential problems and helps devise improvements in the BMP program. Likewise, record keeping and reporting of all maintenance activities, such as cleaning catch basins, will enable the Pollution Prevention Team to evaluate the effectiveness of the BMP program, equipment, and operation. Instructions for conducting the annual site inspection and preparing the site inspection report are provided in Section X of this SWPPP.

3. Retention and Update of Records

The SWPPP will be retained for the life of the general permit. As specified in Part VI.C of the general permit, all records relating to this Plan will be retained for a period of at least six years from the date that the records were prepared or procured. Completed annual site inspection worksheets should be kept in Appendix G of the plan.
The SWPPP will be revised to reflect structural and operational modifications at the facility, whenever they occur. Schedules for performing such revisions to the plan are discussed in Section X.1. To aid in updating the SWPPP, additional blank copies of the worksheets are included in Appendix L. Superseded pages should be kept as Appendix J for a record of changes that have been made at the facility.

G. Consistency with other Plans

There are no other plans for the Independence Municipal Airport.

X. Site Compliance Evaluation

A. Site Inspection

At least once a year, members of the Pollution Prevention Team identified in Section II will conduct a comprehensive site compliance evaluation of the Independence Municipal Airport. The elements evaluated during the site inspection will be in accordance with those listed in Worksheet 7 and the site Best Management Practice (BMP) identification in Worksheet 8, both of which are provided in Appendix F.
The site inspection will identify any modifications or changes to the physical structures and/or operational practices at the facility. These changes will be reflected on the site map and incorporated into this SWPPP within two weeks of the site inspection. If the measures and controls used at the facility to prevent storm water pollution are to be altered, the changes will be implemented within twelve weeks after the site inspection. The above time schedules are as specified in the general permit.

B. Inspection Report

A report summarizing the scope of the inspection, personnel making the inspection, the date(s) of the inspection, major observations relating to the implementation of the SWPPP, and corrective actions taken will be prepared. The report will be signed by the Facility superintendent, or another responsible party identified in Part VI.G of the general permit. The report will be retained as part of the SWPPP for at least six years. Worksheets 3,4,7, and 8 will serve as the foundation for this report. Annual updates of this worksheet will be filed in Appendix G.
This SWPPP is a dynamic document that will be modified on at least an annual basis. The records from site compliance evaluations will be diligently maintained and incorporated into the SWPPP.

XI. Monitoring Requirements

Storm water sampling shall be required only upon request of IDNR.
Should sampling be required, it should occur as soon as possible following an IDNR request with the reporting of the analysis within 30 days of the sampling date. Areas of true sheet flow (a thin, continuous film of flow over relatively smooth and level surfaces) are not required to be monitored as outfalls unless notified by the Department. However, if the onsite stormwater concentrates into any discernable, confined, and discrete conveyance such as a channel, gully, ditch, discrete fissure, collection system or other convenances, monitoring at those outfall locations from which pollutants are or may be discharged will be required.
Should sampling be required, samples will be collected at OUT-1 & OUT-2 identified on the site map. All samples shall be collected from a discharge resulting from a storm event of greater than 0.1 inches. The storm event must occur at least 72 hours from the previously measured (greater than 0.1-inch rainfall) storm event.
Within the first hour of the storm event or within the first hour after runoff begins, a grab sample shall be collected at a designated stormwater outfall and analyzed for the parameters requested by IDNR.
A composite sample shall be collected as a time-weighted sample with a minimum of three grab aliquots (at least 15 minutes apart) collected for each hour of the discharge. Sampling shall begin within the first 15 minutes of discharge and shall extend at least three hours or the entire duration of the storm event. The composite sample shall be analyzed for the parameters requested by IDNR.

Appendix A: Notice of Intent (NOI) Form

Appendix B: Iowa General Storm Water Permit

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
GENERAL PERMIT NO. 1
EFFECTIVE DATES
MARCH 1, 2023 THROUGH FEBRUARY 29, 2028
FOR
STORM WATER DISCHARGE ASSOCIATED WITH INDUSTRIAL ACTIVITY

IOWA DEPARTMENT OF NATURAL RESOURCES

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

GENERAL PERMIT NO. 1

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FOR

STORM WATER DISCHARGE ASSOCIATED WITH INDUSTRIAL ACTIVITY

NPDES GENERAL PERMIT NO. 1
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PART I. COVERAGE UNDER THIS PERMIT

A. PERMIT AREA

This permit covers all areas of the State of Iowa.

B. ELIGIBILITY

1. **Authorization.** Except for storm water discharges identified under Part I.B.2., this permit may authorize the discharge of all new and existing storm water discharge associated with industrial activity (*defined in Part VIII of this permit*) that are composed entirely of storm water or storm water mixed with non-storm water listed in Part III.A of this permit.
2. **Limitations on Coverage**. The following types of storm water discharges associated with industrial activity are NOT authorized by this permit:
   - **a.** storm water discharge associated with industrial activity which are subject to an existing effluent guideline limitation for a discharge of storm water or a discharge which is a combination of storm water and process water[1];
   - **b.** storm water discharge associated with industrial activity from facilities with an existing NPDES individual permit for the storm water discharge or which are issued an individual permit in accordance with Part I.C. of this permit. Storm water discharge under an existing individual NPDES permit may be authorized by this permit after the existing permit expires;
   - **c.** storm water discharge associated with industrial activity for construction activities;
   - **d.** storm water discharge associated with industrial activity from asphalt plants, concrete batch plants, rock crushing plants; and, sand and/or gravel operations; except for facilities which are subject to requirements to report releases into the environment under Title III, Section 313 of the Superfund Amendments and Reauthorization Act (SARA) for chemicals which are classified as Section 313 water priority chemicals;
   - **e.** storm water discharge associated with industrial activity that the Department has shown to be or may reasonably be expected to be contributing to a violation of a water quality standard;
   - **f.** new or expanded storm water discharge associated with industrial activity that discharges to Outstanding Iowa Waters or to Outstanding National Resource Waters; and
   - **g.** storm water discharge associated with industrial activity from airports that begin operations on or after October 1, 2012 and have 1,000 or more annual non-propeller aircraft departures.
3. Storm water discharges associated with industrial activity which are authorized by this permit may be combined with other sources of storm water which are not classified as associated with industrial activity pursuant to 40 CFR 122.26(b)(14).
4. **Exclusions.** The following storm water discharges associated with industrial activity do NOT require an NPDES permit:
   - **a.** Discharges from agricultural and silvicultural activities including storm water runoff from orchards, cultivated crops, pastures, range lands, and forest lands, but not discharges from concentrated animal feeding operations as defined in 40 CFR Section 122.23, concentrated aquatic production facilities as defined in 40 CFR Section 122.24, discharges to aquaculture projects as defined in 40 CFR Section 122.25, and discharges from silvicultural point sources as defined in 40 CFR Section 122.27.
   - **b.** Discharges of storm water runoff from mining operations or oil and gas exploration, production, processing, or treatment operations or transmission facilities, composed entirely of flows which are from conveyances or systems of conveyances used for collecting and conveying precipitation runoff and which are not contaminated by contact with, or do not come in contact with, any overburden, raw material, intermediate products, finished products, byproduct, or waste products located on the site of such operations.

[1] For the purpose of this permit, the following effluent guideline limitations address storm water: cement manufacturing (40 CFR Part 411); feedlots (40 CFR Part 412); fertilizer manufacturing (40 CFR Part 418); petroleum refining (40 CFR Part 419); phosphate manufacturing (40 CFR Part 422); steam electric (coal pile runoff) (40 CFR Part 423); coal mining (40 CFR Part 434); mineral mining and processing (40 CFR Part 436); ore mining and dressing (40 CFR Part 440); and asphalt emulsion (40 CFR Part 443).

C. REQUIRING AN INDIVIDUAL PERMIT

1. The Department may require any person authorized to discharge under this permit to apply for and obtain an individual NPDES permit. When the Department notifies a discharger to apply for an individual permit a deadline, not longer than one year, will be established for submitting the application. If a person fails to submit an individual NPDES permit application by the deadline established by the Department under this paragraph, the applicability of this general permit to the NPDES permittee is automatically terminated at the end of the day specified for application submittal.
2. Any owner or operator authorized to discharge by this permit may request to be excluded from coverage under this permit by applying for an individual permit. The application for an individual permit shall include industrial application Form 1, Form 2F, and Form 5 and all applicable fees and shall be submitted to the Department in accordance with subrule 567 IAC 64.3(4).
3. When an individual NPDES permit is issued to an owner or operator, the applicability of this permit to the individual NPDES permittee is automatically terminated on the issuance date of the individual NPDES permit. When an individual NPDES permit is denied to an owner or operator for a discharge otherwise subject to this permit, the applicability of this permit to the individual NPDES permittee is automatically terminated on the date of such denial, unless otherwise specified by the Department.

D. AUTHORIZATION

1. Discharges of storm water associated with industrial activity must submit a complete Notice of Intent (NOI) in accordance with the requirements of Part II of this permit to be authorized to discharge under this general permit.
2. Unless notified by the Department to the contrary, owners or operators who submit such notification are authorized to discharge storm water associated with industrial activity under the terms and conditions of this permit. Upon review of the NOI, the Department may deny coverage under this permit and require submittal of an application for an individual NPDES permit.

PART II. NOTICE OF INTENT (NOI) REQUIREMENTS

A. DEADLINES FOR NOTIFICATION

Facilities which begin discharging storm water associated with industrial activity after October 1, 1992 are not allowed to discharge storm water associated with industrial activity until an authorization has been issued for the facility by the Department.

B. FAILURE TO NOTIFY

Owners (or operators when owners do not operate the facility), who fail to notify the Department of their intent to be covered by this permit, and discharge pollutants to waters of the state without an NPDES permit, are in violation of the CWA and the Iowa Code.

C. CONTENTS OF A NOI

A complete NOI shall include the items described in Parts II.C.1., II.C.2., and II.C.3. of this permit.

1. A completed NOI Form, DNR Form 542-1415, signed in accordance with Parts VI.H. and VI.I of this permit. The information on the form shall include all of the following:
   - **a.** Name, address, and location of the facility for which this notification is submitted. The location shall be provided as the 1/4 section (NE, SE, SW, NW), section, township, range and county where the storm water discharge is located;
   - **b.** The 4-digit Standard Industrial Classification (SIC) code that best represents the principal products or activities provided by the facility;
   - **c.** The operator's name, address, telephone number, and status (federal, state, private, public or other entity);
   - **d.** The type of discharge (new or existing); whether or not the discharge is to a municipal separate storm sewer system; the date the discharge is to commence; the permit status of the discharge; and, the name of the receiving water(s);

e. An indication of whether this facility has existing quantitative data describing the concentration of pollutants in storm water discharges. Existing data should not be included as part of the NOI, it should be retained as part of the Storm Water Pollution Prevention Plan (SWPPP); and

f. A certification that the terms and conditions of the general permit will be met.

2. Applicable Fees. The applicable fees specified in 567 IAC 64.16(455B).

3. Public Notification. A demonstration that the public notice requirements in 567 IAC 64.6(1)"*c*"(1) was published at least one day in the newspaper with the largest circulation in the area in which the facility is located or the activity will occur.

D. WHERE TO SUBMIT

Facilities which discharge storm water associated with industrial activity must submit items described in Part II.C. of this permit to the Department online at https://programs.iowadnr.gov/stormwater/pages/home.aspx or by mail to the following address: Storm Water Coordinator, Iowa Department of Natural Resources, 502 E 9th St., Des Moines IA 50319-0034.

E. RENOTIFICATION

Prior to the expiration of an authorization issued under this general permit, the permittee is required to resubmit a NOI (no additional public notice is required) with the Department for coverage under the new general permit. If a new general permit has not been reissued prior to the expiration of the current permit, the provisions and coverage of the current permit are extended until replaced by the adoption of a new general permit.

F. NOTICE OF DISCONTINUATION (NOD)

1. A notice to discontinue the activity covered by this NPDES general permit must be made in writing to the Department within 30 days of the discontinuance of the discharge.

2. A NOD shall include the following information:

a. the name of the owner/operator to which the permit was issued;

b. the general permit number and permit authorization number;

c. the date the discharge will be or has been discontinued, and,

d. the following certification signed in accordance with Part VI.H. of this permit:
I certify under penalty of law that all storm water discharges associated with industrial activity from the identified facility that are authorized by this NPDES General Permit No. 1 have been eliminated. I understand that by submitting this Notice of Discontinuation, that I am no longer authorized to discharge storm water associated with industrial activity by Iowa Department of Natural Resources General NPDES Permit No. 1. and that discharging pollutants in storm water associated with industrial activity to waters of the United States is unlawful under the Clean Water Act where the discharge is not authorized by a NPDES permit.

PART III. SPECIAL CONDITIONS, MANAGEMENT PRACTICES, AND OTHER NON-NUMERIC LIMITATIONS

A. PROHIBITION ON NON-STORM WATER DISCHARGES

All discharges covered by this permit shall be composed entirely of storm water except as follows: discharges from firefighting activities, fire hydrant flushings, potable water sources including waterline flushings, uncontaminated groundwater, foundation or footing drains where flows are not contaminated with process materials such as solvents, springs, riparian habitats, wetlands, irrigation water, exterior building washdown, pavement washwaters where spills or leaks of toxic or hazardous materials have not occurred and where detergents are not used, and air conditioning condensate, that are combined with storm water discharges associated with industrial activity may be authorized by this permit provided the non-storm water component of the discharge is in compliance with Part III.C.4.H of this permit.

B. RELEASES IN EXCESS OF REPORTABLE QUANTITIES

Any owner or operator identified in the SWPPP is subject to the spill notification requirements as specified in Iowa Code section 455B.386. Iowa law requires that as soon as possible but not more than six hours after the onset of a

hazardous condition[2] the Department and local sheriff's office or the office of the sheriff of the affected county be notified.

The SWPPP described in Part III.C. of this permit must be modified within 7 calendar days of knowledge of the release to provide a description of the release and the circumstances leading to the release and to identify and provide for the implementation of steps to prevent the reoccurrence of such releases and to respond to such releases.

C. STORM WATER POLLUTION PREVENTION PLANS (SWPPP)

A SWPPP shall be developed for each facility covered by this permit. SWPPPs shall be prepared in accordance with good engineering practices. The SWPPP shall identify potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges associated with industrial activity from the facility. The SWPPP shall describe and ensure the implementation of practices which will be used to reduce pollutants in storm water discharges associated with industrial activity at the facility and to assure compliance with the terms and conditions of this permit. Facilities must implement the provisions of the SWPPP required under this part as a condition of this permit.

1. **Deadlines for SWPPP Preparation and Compliance.** The SWPPP shall be completed before a NOI is submitted to the Department. Full implementation of the SWPPP will be executed concurrently with operations at the facility, or in the case of a new facility, with the start of operations at the facility.
2. **Signature and SWPPP Review.**
   - **a.** The SWPPP shall be signed in accordance with Part VI.H. of this permit, and shall be retained on site in accordance with Part V.E. of this permit.
   - **b.** The owner or operator of a facility with a storm water discharge covered by this permit shall make SWPPPs available within three hours of being requested by the Department or, in the case of a storm water discharge associated with industrial activity which discharges through a municipal separate storm sewer system with an NPDES permit, to the municipal operator of the system.
   - **c.** The Department may review the SWPPP at any time and may notify the permittee that the SWPPP does not meet one or more of the minimum requirements of this Part. After such notification from the Department, the permittee shall make changes to the SWPPP and shall submit to the Department a written certification that the requested changes have been made. Unless otherwise provided by the Department, the permittee shall have 30 days after such notification to make the necessary changes.
3. **SWPPP Amendments**. The permittee shall amend the SWPPP whenever there is a change in design, construction, operation, or maintenance, which has a significant effect on the potential for the discharge of pollutants to waters of the U.S. or if the SWPPP proves to be ineffective in achieving the general objectives of controlling pollutants in storm water discharges associated with industrial activity. Amendments to the SWPPP may be reviewed by the Department in the same manner as Part III.C.2. above.
4. **Contents of the SWPPP.** The SWPPP shall include, at a minimum, the following items:
   - **a. Description of Potential Pollutant Sources.** Each SWPPP shall provide a description of potential sources which may reasonably be expected to add significant amounts of pollutants to storm water discharges or which may result in the discharge of pollutants during dry weather from separate storm sewers draining the facility. Each SWPPP shall identify all activities and significant materials which may potentially be significant pollutant sources. Each SWPPP shall include, at a minimum:
     - **a.(1).** A site map showing an outline of the drainage area of each storm water outfall; each existing structural control measure to reduce pollutants in storm water runoff; and each surface water body;
     - **a.(2).** A narrative description of:
       - **a.(2).i.** known significant materials that have been treated, stored or disposed, in a manner to allow exposure to storm water, during the three years prior to the discharge authorization date of this permit;
       - **a.(2).ii.** the method of on-site storage or disposal;

[2] see Definitions, Part VIII

a.(2).iii. materials management practices employed to minimize contact of these materials with storm water runoff;

a.(2).iv. materials loading and access areas;

a.(2).v. the location and a description of existing structural and non-structural control measures to reduce pollutants in storm water runoff; and

a.(2).vi. a description of any treatment the storm water receives;

a.(3). A list of releases which prompted the existence of a hazardous condition (as defined in Part VIII of this permit) that occurred at the facility after the effective date of this permit;

a.(4). For each area of the plant that generates storm water associated with industrial activity with a reasonable potential for containing significant amounts of pollutants, a prediction of the direction of flow, and an estimate of the types of pollutants which are likely to be present in storm water discharges; and,

a.(5). A summary of existing sampling data describing pollutants in storm water discharges.

b. Storm Water Management Controls. Each facility covered by this permit shall develop a description of storm water management controls appropriate to the facility, and, implement such controls. The appropriateness and priorities of controls in a SWPPP shall reflect identified potential sources of pollutants at the facility. The description of storm water management controls shall address the following minimum components, including a schedule for implementing such controls:

b.(1). Responsible Person. The SWPPP shall identify a specific individual or individuals within the organization responsible for developing the SWPPP and assisting in its implementation, maintenance, and revision.

b.(2). Risk Identification and Assessment/Material Inventory. The SWPPP shall assess the potential of various sources at the plant to contribute pollutants to storm water discharges associated with industrial activity. The SWPPP shall include an inventory of the types of materials handled. Facilities subject to SARA Title III, Section 313 shall include in the SWPPP a description of releases to land or water of SARA Title III water priority chemicals that have occurred during the three years prior to the discharge authorization date of this permit. Each of the following shall be evaluated for the reasonable potential for contributing pollutants to runoff:

b.(2).i. loading and unloading operations;

b.(2).ii. outdoor storage activities;

b.(2).iii. outdoor manufacturing or processing activities;

b.(2).iv. dust or particulate generating processes; and

b.(2).v. on-site waste disposal practices.

Factors to consider include the toxicity of chemicals; quantity of chemicals used, produced, or discharged; the likelihood of contact with storm water; and history of hazardous condition reporting.

b.(3). Preventive Maintenance. The SWPPP shall describe a preventive maintenance program that involves inspection and maintenance of storm water management devices (e.g. cleaning oil/water separators, catch basins) as well as inspecting and testing plant equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters.

b.(4). Good Housekeeping. Good housekeeping requires the maintenance of a clean, orderly facility.

b.(5). Spill Prevention and Response Procedures. Areas where potential spills can occur, and their accompanying drainage points shall be identified clearly in the SWPPP. Where appropriate, material handling procedures and storage requirements should be considered in the SWPPP. Procedures for cleaning up spills shall be identified in the SWPPP and made available to the appropriate personnel. The necessary equipment to implement a clean up shall be available to personnel.

b.(6). Storm Water Management. The SWPPP shall contain a narrative consideration of the appropriateness of traditional storm water management practices (practices other than those which control the source of pollutants). Based on an assessment of the potential of various sources at th

plant to contribute pollutants to storm water discharges associated with industrial activity (see Part III.C.4.b.(2). of this permit), the SWPPP shall provide that measures determined to be reasonable and appropriate shall be implemented and maintained.

b.(7). **Sediment and Erosion Prevention.** The SWPPP shall identify areas which, due to topography, activities, or other factors, have a high potential for significant soil erosion, and identify measures to limit erosion.

b.(8). **Employee Training.** Employee training programs shall inform personnel at all levels of responsibility of the components and goals of the SWPPP. Training should address topics such as spill response, good housekeeping and material management practices. The SWPPP shall identify periodic dates for such training.

b.(9). **Record keeping and Internal Reporting Procedures.** Incidents such as spills, or other discharges, along with other information describing the quality and quantity of storm water discharges shall be included in the records. Inspection and maintenance activities shall be documented and recorded.

b.(10). **Non-Storm Water Discharges.** The SWPPP shall include a certification that the discharge has been tested or evaluated for the presence of non-storm water discharges. The certification shall include a description of the results of any test for the presence of non-storm water discharges, the method used, the date of any testing, and the on-site drainage points that were directly observed during the test. This certification may not be feasible if the facility operating the storm water discharge does not have access to an outfall, manhole, or other point of access to the ultimate conduit which receives the discharge. In such cases, the source identification section of the SWPPP shall indicate why the certification required by this part was not feasible. A discharger that is unable to provide the certification required by this paragraph must notify the Department in accordance with Part V.A. of this permit.

c. **Visual Inspection.** Qualified personnel shall inspect designated equipment and plant area at appropriate intervals specified in the SWPPP, but, in no case less than once a year, except as provided in Parts III.C.4.c.(4). and (5) of this permit.

c.(1). Material handling areas and other potential sources of pollution identified in the SWPPP shall be inspected for evidence of, or the potential for, pollutants entering the drainage system. Structural storm water management measures, sediment and erosion control measures, and other structural pollution prevention measures identified in the SWPPP shall be observed to ensure that they are operating correctly. A visual inspection of equipment needed to implement the SWPPP, such as spill response equipment, shall be made.

c.(2). Based on the results of the inspection, the description of potential pollutant sources and the pollution prevention measures identified in the SWPPP shall be revised as appropriate within two weeks of the inspection. The revised pollution prevention measures shall be fully implemented within twelve weeks of the inspection.

c.(3). A report shall be made and retained as part of the SWPPP for at least three years. The report shall be signed in accordance with Part VI.H. of this permit. The report shall contain the following: a summary of the inspection, personnel making the inspection, the date(s) of the inspection, major observations relating to the implementation of the SWPPP, and actions taken in accordance with Part III.C.4.c.(2). of this permit.

c.(4). When the annual site inspections in the SWPPP are impractical because an employee is not stationed on site or does not routinely visit the site, then site inspections shall occur at least once every three years.

c.(5). When the annual site inspections in the SWPPP are impractical for inactive sites (sites where industrial activity is no longer conducted), then site inspections shall occur at least once every five years. After a site becomes inactive, at least one site inspection shall occur within two years.

d. **Special Requirements for Storm Water Discharges Associated with Industrial Activity Through Municipal Separate Storm Sewer Systems.** Facilities covered by this permit must comply with applicable requirements in municipal storm water management programs developed under NPDES permits issued for the discharge from the municipal separate storm sewer system that receives the facility's discharge.

e. Consistency with Other Plans. Storm water management programs may incorporate by reference Spill Prevention Control and Countermeasure (SPCC) plans drafted pursuant to section 311 of the CWA or Best Management Practices (BMP) Programs otherwise required by another NPDES permit and may incorporate any part of such plans into the SWPPP by reference.

f. Additional Requirements for Storm Water Discharge Associated with Industrial Activity from Facilities Subject to SARA Title III, Section 313 Requirements. SWPPPs for facilities subject to reporting requirements under SARA Title III, Section 313 for chemicals which are classified as Section 313 water priority chemicals in accordance with the definition in Part VIII of this permit are required to include, in addition to the information listed above, a discussion of the facility's conformance with the appropriate guidelines listed below:

f.(1). In areas where Section 313 water priority chemicals are stored, processed or otherwise handled, appropriate containment, drainage control and/or diversionary structures shall be provided. At a minimum, one of the following preventive systems or its equivalent shall be used:

f.(1).i. curbing, culverting, gutters, sewers or other forms of drainage control to prevent or minimize the potential for storm water run-on to come into contact with significant sources of pollutants; or

f.(1).ii. roofs, covers or other forms of appropriate protection to prevent storage piles from exposure to storm water, and wind blowing.

f.(2). If the installation of structures or equipment listed in Parts III.C.4.f.(3).i.(b). or III.C.4.f.(3).iii. of this permit is not economically achievable at a given facility, the facility shall develop and implement a spill contingency and integrity testing plan which provides a description of measures that ensure spills or other releases of toxic amounts of Section 313 water priority chemicals do not occur as an alternative to Parts III.C.4.f.(3).i.(b). or III.C.4.f.(3).iii. of this permit. A spill contingency and integrity testing plan developed under this paragraph shall comply with the minimum requirements listed in Parts III.C.4.f.(2).(a). through (d) of this permit.

f.(2).i. The spill contingency and integrity testing plan shall include a detailed description which demonstrates that the requirements of Parts III.C.4.f.(3).i.(b). and III.C.4.f.(3).iii. of this permit are not economically achievable;

f.(2).ii. A spill contingency and integrity testing plan must include, at a minimum:

f.(2).ii.(a). a description of response plans, personnel needs, and methods of mechanical containment;

f.(2).ii.(b). steps to be taken for removal of spilled Section 313 water priority chemicals;

f.(2).ii.(c). access to and availability of sorbents and other equipment; and

f.(2).ii.(d). such other information as required by the Department;

f.(2).iii. The testing component of the alternative spill contingency and integrity testing plan must provide for conducting integrity testing of storage tanks at least once every five years, and conducting integrity and leak testing of valves and piping a minimum of every year; and

f.(2).iv. A written and actual commitment of manpower, equipment and materials required to comply with the provisions of Parts III.C.4.f.(2).ii. and iii. of this permit and to expeditiously control and remove quantities of Section 313 water priority chemicals that may result in a toxic discharge.

f.(3). In addition to the minimum standards listed under Part III.C.4.f.(1). of this permit, the SWPPP shall include a complete discussion of measures taken to conform with the following applicable guidelines:

f.(3).i. Liquid Storage Areas Where Storm Water Comes into Contact with Equipment or a Tank, Container, or Other Vessel Used for Section 313 Water Priority Chemicals.

f.(3).i.(a). No tank or container shall be used for the storage of a Section 313 water priority chemical unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature, etc.

f.(3).i.(b). Secondary containment, sufficient to contain the capacity of the largest single container or tank in a drainage system where Section 313 water priority chemicals are stored shall be provided. If the secondary containment area and its upstream drainage system are subject to precipitation, an allowance for drainage from a 10-year, 24-hour precipitation event shall be provided over and above the volume necessary to contain the largest single tank or container. Either a secondary containment system shall be sufficiently impervious to contain spilled Section 313 water priority chemicals until they can be removed or treated or the SWPPP must include spill contingency provisions which include, at a minimum, a description of response plans, personnel needs, and methods of mechanical containment; steps to be taken for removal of spilled Section 313 water priority chemicals; and access to and availability of sorbents and other equipment. The plant treatment system may be used to provide secondary containment, provided it has sufficient excess holding capacity always available to hold the contents of the largest container in the drainage area plus an allowance for drainage from a 10-year, 24-hour precipitation event.

f.(3).ii. Material Storage Areas for Section 313 Water Priority Chemicals Other Than Liquids. Material storage areas for Section 313 water priority chemicals other than liquids, which are subject to runoff, leaching, or wind blowing, shall incorporate drainage or other control features which will minimize the discharge of Section 313 water priority chemicals.

f.(3).iii. Truck and rail car loading and unloading areas for liquid Section 313 water priority chemicals. Truck and rail car loading and unloading areas for liquid Section 313 water priority chemicals shall be operated to minimize discharges of Section 313 water priority chemicals. Drip pans shall be placed at locations where spillage may occur such as hose connections, hose reels and filler nozzles. Drip pans shall always be used when making and breaking hose connections. A drip pan system shall be installed within the rails of railways to collect spillage from tank cars. Truck loading/unloading docks shall have overhangs or door skirts that enclose the trailer end.

f.(3).iv. In plant areas where Section 313 water priority chemicals are transferred, processed or otherwise handled. Processing equipment and material handling equipment shall be designed and operated so as to minimize discharges of Section 313 chemicals. Materials used in piping and equipment shall be compatible with the substances handled. Drainage from process and materials handling areas shall be designed as described in paragraphs f.(3).i., ii., and iii. of this part. Additional protection, such as covers or guards to prevent wind blowing, spraying or releases from pressure relief vents shall be provided as appropriate to prevent discharge of Section 313 water priority chemicals. Visual inspections or leak tests shall be provided for overhead piping conveying Section 313 water priority chemicals without secondary containment.

f.(3).v. Discharges from areas covered by paragraphs f.(3).i., ii., iii. or iv.

f.(3).v.(a). Drainage from areas covered by paragraphs f.(3).i. ii., iii. or iv. of this part shall be restrained by valves or other positive means to prevent the discharge of a spill or other excessive leakage of Section 313 water priority chemicals. Containment areas may be emptied by pumps or ejectors; however, these shall be manually activated.

f.(3).v.(b). Flapper-type drain valves shall not be used to drain containment areas. Valves used for the drainage of containment areas shall, as far as is practical, be of manual, open-and-closed design.

f.(3).v.(c). If plant drainage is not engineered as above, the final discharge of all in-plant storm sewers should be equipped to be equivalent with a diversi

system that could, in the event of an uncontrolled spill of Section 313 water priority chemicals, return the spilled material to the facility.

f.(3).v.(d). Records shall be kept of the frequency and estimated volume (in gallons) of discharges from containment areas.

f.(3).vi. Plant site runoff other than from areas covered by f.(3).i., ii., iii., or iv. Other areas of the facility (those not addressed in paragraphs f.(3).i., ii., iii., or iv.), from which runoff which may contain Section 313 water priority chemicals or spills of Section 313 water priority chemicals could cause a discharge, shall incorporate the necessary drainage or other control features to prevent the discharge of spilled or improperly disposed material and ensure the mitigation of pollutants in runoff or leachate.

f.(3).vii. Preventive Maintenance and Housekeeping. All areas of the facility shall be inspected at specific intervals for leaks or conditions that could lead to discharges of Section 313 water priority chemicals or direct contact of storm water with raw materials, intermediate materials, waste materials or products. In particular, plant piping, pumps, storage tanks and bins, pressure vessels, process and material handling equipment, and material bulk storage areas shall be examined for any conditions or failures which could cause a discharge. Inspections shall include examination for leaks, wind blowing, corrosion, support or foundation failure, or other forms of deterioration or noncontainment. Inspection intervals shall be specified in the SWPPP and shall be based on design and operational experience. Different areas may require different inspection intervals. Where a leak or other condition is discovered which may result in significant releases of Section 313 water priority chemicals to the drainage system, corrective action shall be immediately taken or the unit or process shut down until corrective action can be taken. When a leak or noncontainment of a Section 313 water priority chemical has occurred, contaminated soil, debris, or other material must be promptly removed and disposed in accordance with Federal and State requirements and as described in the SWPPP.

f.(3).viii. Facility security. Facilities shall have the necessary security systems to prevent accidental or intentional entry which could cause a discharge. Security systems described in the SWPPP shall address fencing, lighting, vehicular traffic control, and securing of equipment and buildings.

f.(3).ix. Training. Facility employees and contractor personnel using the facility shall be trained in and informed of preventive measures at the facility. Employee training shall be conducted at intervals specified in the SWPPP, but not less than once per year, in matters of pollution control laws and regulations, in the SWPPP, and in the particular features of the facility and its operation which are designed to minimize discharges of Section 313 water priority chemicals. The SWPPP shall designate a person who is accountable for spill prevention at the facility and who will set up the necessary spill emergency procedures and reporting requirements so that spills and emergency releases of Section 313 water priority chemicals can be isolated and contained before a discharge of a Section 313 water priority chemical can occur. Contractor or temporary personnel shall be informed of plant operation and design features in order to prevent discharges or spills from occurring.

g. Salt Storage. Salt storage piles at a facility that falls under the definition of storm water discharge associated with industrial activity that are used for deicing or other commercial or industrial purposes shall be enclosed or covered to prevent exposure to precipitation.

h. Non-Storm Water Discharges. Sources of non-storm water listed in Part III.A. of this permit that are combined with storm water discharges associated with industrial activity must be identified in the SWPPP. Flows from firefighting activities are exempt from this requirement. The SWPPP shall identify and ensure the implementation of appropriate pollution prevention measures for the non-storm water component(s) of the discharge.

5. All SWPPPs received by the Department from the permittee are considered reports that shall be available to the public under Section 308(b) of the CWA and Iowa Code Chapter 22. However, the permittee may claim any portion of a SWPPP as confidential in accordance with Iowa Code Chapter 22 and 561 IAC 2.5.
6. No condition of this permit shall release the permittee from any responsibility or requirements under other environmental statutes or regulations.

D. AIRPORTS

Airports with 1,000 or more annual non-propeller aircraft departures are prohibited from discharging storm water containing urea (diaminomethanal). All airports with 1,000 annual non-propeller aircraft departures or more must either certify annually that airfield deicing products using urea are not used or must collect a grab sample once each month of the undiluted storm water runoff from the areas where the deicing products using urea have been used and meet a maximum daily limit of 14.7 milligrams per liter (mg/l) of ammonia as nitrogen. Sampling is to be conducted each month from September through May. Annual certifications shall be kept with the SWPPP.

PART IV. NUMERIC EFFLUENT LIMITATIONS

Coal Pile Runoff. Any storm water composed in part or in whole of coal pile runoff shall not exceed a maximum concentration at any time of 50.0 milligrams per liter (mg/l) of total suspended solids. The pH of these discharges shall be within the range of 6.5-9.0. Any untreated overflow from facilities designed, constructed and operated to treat the volume of coal pile runoff which is associated with a 10 year, 24 hour rainfall event shall not be subject to the limitations of this part.

PART V. MONITORING AND REPORTING REQUIREMENTS

A. FAILURE TO CERTIFY

Any facility that is unable to provide the certification required under Part III.C.4.(B).(10). of this permit (testing for non-storm water discharges) within 180 days of the discharge authorization date must prepare a written description that includes all of the following:

1. the procedures used in any test conducted for the presence of non-storm water discharges;
2. the results of the test or other relevant observations;
3. potential sources of non-storm water discharges to the storm sewer; and
4. why adequate tests for such storm sewers were not feasible.

This “failure to certify” description must be kept on-site and be made available to the Department upon request.

B. MONITORING REQUIREMENTS

The following monitoring requirements are delineated for specific facilities that fall under the definition of storm water discharge associated with industrial activity.

1. **SARA Title III, Section 313 Facilities.** During the period beginning on the discharge authorization date and lasting through the expiration date of this permit, facilities subject to requirements to report releases into the environment under SARA Title III, Section 313 for chemicals which are classified as Section 313 water priority chemicals are subject to the following monitoring requirements for storm water discharges associated with industrial activity that comes into contact with any equipment, tank, container or other vessel used for storage of a Section 313 water priority chemical, or located at a truck or rail car loading or unloading area where a Section 313 water priority chemical is handled;
   a. **Parameters.** The parameters to be measured include all of the following:
      - oil and grease (mg/l);
      - five day biochemical oxygen demand (BOD5) (mg/l);
      - chemical oxygen demand (COD) (mg/l);
      - total suspended solids (TSS) (mg/l);
      - total Kjeldahl nitrogen (TKN) (mg/l);
      - total phosphorus (mg/l);
      - pH;

- any SARA Section 313 water priority chemical for which the facility is subject to reporting requirements under SARA Section 313;
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event; and,
- an estimate of the total volume (in gallons) of the discharge sampled.

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) except as provided by Parts V.B.13. or V.B.14. of this permit.

2. Primary Metal Industries. During the period beginning on the discharge authorization date and lasting through the expiration date of this permit, facilities classified as SIC 33 (Primary Metal Industry) are subject to the following monitoring requirements for storm water discharges associated with industrial activity that are discharged from the facility:

a. Parameters. The parameters to be measured include all of the following:

- oil and grease (mg/l);
- five day biochemical oxygen demand (BOD5) (mg/l);
- chemical oxygen demand (COD) (mg/l);
- total suspended solids (TSS) (mg/l);
- total Kjeldahl nitrogen (TKN) (mg/l);
- nitrate plus nitrite nitrogen (mg/l);
- total phosphorus (P) (mg/l);
- pH;
- total lead (Pb) (mg/l);
- total cadmium (Cd) (mg/l);
- total copper (Cu) (mg/l);
- total arsenic (As) (mg/l);
- total chromium (Cr) (mg/l);
- any pollutant limited in an effluent guideline to which the facility is subject;
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event;
- an estimate of the size of the drainage area (in square feet); and
- an estimate of the runoff coefficient of the drainage area (e.g. low (under 40%), medium (40% to 65%) or high (above 65%)).

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) except as provided by Parts V.B.13. or V.B.14. of this permit.

3. Land Disposal Units/Incinerators. During the period beginning on the discharge authorization date and lasting through the expiration date of this permit, storm water discharge associated with industrial activity from any active or inactive landfill, land application site, or open dump that received any industrial wastes (except facilities that only receive construction debris) and that have not installed a stabilized final cover, and incinerators that burn hazardous waste and operate under interim status or a permit under Subtitle C of the Resource Conservation and Recovery Act (RCRA), are subject to the following monitoring requirements:

a. Parameters. The parameters to be measured include all of the following:

- ammonia nitrogen (mg/l);
- bicarbonate (mg/l);
- calcium (Ca) (mg/l);
- chloride (mg/l);
- total iron (Fe) (mg/l);
- magnesium (Mg) (total) (mg/l);

- magnesium (Mg) (dissolved) (mg/l) ;
- nitrate plus nitrite nitrogen (mg/l);
- potassium (K) (mg/l);
- sodium (Na) (mg/l);
- sulfate (mg/l);
- chemical oxygen demand (COD) (mg/l);
- total dissolved solids (TDS) (mg/l);
- total organic carbon (TOC) (mg/l);
- oil and grease (mg/l);
- pH;
- total arsenic (As) (mg/l);
- total barium (Ba) (mg/l);
- total cadmium (Cd) (mg/l);
- total chromium (Cr) (mg/l);
- total cyanide (mg/l);
- total lead (Pb) (mg/l);
- total mercury (Hg) (mg/l);
- total selenium (Se) (mg/l);
- total silver (Ag) (mg/l);
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event; and,
- an estimate of the total volume (in gallons) of the discharge sampled.

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) except as provided by Parts V.B.13. or V.B.14. of this permit.

4. Wood Treatment (chlorophenolic/creosote formulations). During the period beginning on the discharge authorization date and lasting through the expiration date of this permit, storm water discharges associated with industrial activity from areas that are used for wood treatment, wood surface application or storage of treated or surface protected wood at any wood preserving or wood surface facilities that currently use chlorophenolic formulations and/or creosote formulation are subject to the following monitoring requirements:

a. Parameters. The parameters to be measured include all of the following:

- oil and grease (mg/l);
- pH;
- five day biochemical oxygen demand (BOD5) (mg/l);
- chemical oxygen demand (COD) (mg/l);
- total suspended solids (TSS) (mg/l);
- total phosphorus (P) (mg/l);
- total Kjeldahl nitrogen (TKN) (mg/l);
- nitrate plus nitrite nitrogen (mg/l);
- pentachlorophenol (mg/l);
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event;
- an estimate of the size of the drainage area (in square feet); and
- an estimate of the runoff coefficient of the drainage area (e.g. low (under 40%), medium (40% to 65%) or high (above 65%)).

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) except as provided by Parts V.B.13. or V.B.14. of this permit.

5. Wood Treatment (arsenic or chromium preservatives). During the period beginning on the discharge authorization date and lasting through the expiration date of this permit, storm water discharge associated with industrial activity from areas that are used for wood treatment or storage of treated wood at any wood preserving facilities that currently use inorganic preservatives containing arsenic or chromium are subject to the following monitoring requirements:

a. Parameters. The parameters to be measured include all of the following:

- oil and grease (mg/l);
- pH;
- five day biochemical oxygen demand (BOD5) (mg/l);
- chemical oxygen demand (COD) (mg/l);
- total suspended solids (TSS) (mg/l);
- total phosphorus (P) (mg/l);
- total Kjeldahl nitrogen (TKN) (mg/l);
- nitrate plus nitrite nitrogen (mg/l);
- total arsenic (As) (mg/l);
- total chromium (Cr) (mg/l);
- total copper (Cu) (mg/l);
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event;
- an estimate of the size of the drainage area (in square feet); and
- an estimate of the runoff coefficient of the drainage area (e.g. low (under 40%), medium (40% to 65%) or high(above 65%)).

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) except as provided by Parts V.B.13. or V.B.14. of this permit.

6. Coal Pile Runoff. During the period beginning on the discharge authorization date and lasting through the expiration date of this permit, storm water discharge associated with industrial activity from coal pile runoff are subject to the following monitoring requirements:

a. Parameters. The parameters to be measured include all of the following:

- oil and grease (mg/l);
- pH;
- total suspended solids (TSS) (mg/l);
- total copper (Cu) (mg/l);
- total nickel (Ni) (mg/l);
- total zinc (Zn) (mg/l);
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event;
- an estimate of the size of the drainage area (in square feet); and
- an estimate of the runoff coefficient of the drainage area (e.g. low (under 40%), medium (40% to 65%) or high (above 65%)).

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) except as provided by Parts V.B.13. or V.B.14. of this permit.

7. Large Airports. During the period beginning on the effective date and lasting through the expiration date of this permit, storm water discharge associated with industrial activity from runways and areas used for aircraft

deicing at airports with over 50,000 flight operations per year are subject to the following monitoring requirements during a deicing event:

a. Parameters. The parameters to be measured include all of the following:
- oil and grease (mg/l);
- five day biochemical oxygen demand (BOD5) (mg/l);
- chemical oxygen demand (COD) (mg/l);
- total suspended solids (TSS) (mg/l);
- total Kjeldahl nitrogen (TKN) (mg/l);
- total phosphorus (P) (mg/l);
- pH;
- ethylene glycol (mg/l);
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event; and
- an estimate of the total volume (in gallons) of the discharge sampled.

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) during a deicing event except as provided by Parts V.B.13. or V.B.14. of this permit.

8. Airports. During the period beginning on the effective date and lasting through the expiration date of this permit, storm water discharge associated with industrial activity from areas at airports with 1,000 or more annual non-propeller aircraft departures on which urea (diaminomethanal) has been used in the current deicing season are subject to the following monitoring requirements, in addition to any other applicable monitoring requirements:

a. Parameters. The parameters to be measured include all of the following:
- ammonia as nitrogen (mg/l);
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event; and
- an estimate of the total volume (in gallons) of the discharge sampled.

b. Frequency of Monitoring. Sampling shall be conducted at least monthly (1 time per month) from September through May, inclusive, except as provided by Parts V.B.13. or V.B.14. of this permit.

9. Animal Handling/Meat Packing. During the period beginning on the effective date and lasting through the expiration date of this permit, storm water discharge associated with industrial activity from animal handling areas, manure management (or storage) areas, and production waste management (or storage) areas that are exposed to precipitation at meat packing plants, poultry packing plants, facilities that manufacture animal and marine fats and oils, and facilities that manufacture dog and cat food from meat are subject to the following monitoring requirements:

a. Parameters. The parameters to be measured include all of the following:
- oil and grease (mg/l);
- five day biochemical oxygen demand (BOD5) (mg/l);
- chemical oxygen demand (COD) (mg/l);
- total suspended solids (TSS) (mg/l);
- total Kjeldahl nitrogen (TKN) (mg/l);
- total phosphorus (P) (mg/l);
- pH;
- fecal coliform (counts per 200 ml);
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;

- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event; and
- an estimate of the total volume (in gallons) of the discharge sampled.

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) except as provided by Parts V.B.13. or V.B.14. of this permit.

10. Battery Reclaimers. During the period beginning on the effective date and lasting through the expiration date of this permit, storm water discharge associated with industrial activity from facilities that reclaim lead acid batteries are subject to the following monitoring requirements:

a. Parameters. The parameters to be measured include all of the following:

- oil and grease (mg/l);
- five day biochemical oxygen demand (BOD5) (mg/l);
- chemical oxygen demand (COD) (mg/l);
- total suspended solids (TSS) (mg/l);
- total Kjeldahl nitrogen (TKN) (mg/l);
- total phosphorus (P) (mg/l);
- pH;
- lead (Pb) (mg/l);
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event; and
- an estimate of the total volume (in gallons) of the discharge sampled.

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) except as provided by Parts V.B.13. or V.B.14. of this permit.

11. Coal-fired Steam Electric Facilities. During the period beginning on the effective date and lasting through the expiration date of this permit, storm water discharge associated with industrial activity from coal handling sites other than coal piles at coal fired steam electric power generating facilities are subject to the following monitoring requirements:

a. Parameters. The parameters to be measured include all of the following:

- oil and grease (mg/l);
- total suspended solids (TSS) (mg/l);
- copper (Cu) (mg/l);
- nickel (Ni) (mg/l);
- zinc (Zn) (mg/l);
- pH;
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event; and
- an estimate of the total volume (in gallons) of the discharge sampled.

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) except as provided by Parts V.B.13. or V.B.14. of this permit.

12. Additional facilities. During the period beginning on the effective date and lasting through the expiration date of this permit, facilities with storm water discharge associated with industrial activity that: come in contact with storage piles for solid chemicals used as raw materials that are exposed to precipitation at facilities classified as SIC 30 (Rubber and Miscellaneous Plastics Products) or SIC 28 (Chemicals and Allied Products); automobile junkyards with over 250 units; come into contact with sludge storage and handling areas at publicly-owned treatment works (POTWs) with a service population of over 100,000 or sludge incinerators or digesters associated with a POTW with a service population of over 100,000; come into contact with lime storage piles that are exposed to precipitation at lime manufacturing facilities; from oil handling sites at oil fired steam

electric power from generating facilities; from facilities that manufacture asphalt paving mixtures and blocks; from cement manufacturing facilities and cement kilns; from ready-mixed concrete facilities; or from ship building and repairing facilities, are subject to the following monitoring requirements:

a. Parameters. The parameters to be measured include all of the following:

- oil and grease (mg/l);
- five day biochemical oxygen demand (BOD5) (mg/l);
- chemical oxygen demand (COD) (mg/l);
- total suspended solids (TSS) (mg/l);
- total Kjeldahl nitrogen (TKN) (mg/l);
- total phosphorus (mg/l);
- pH;
- any pollutant limited in an effluent guideline to which the facility is subject;
- the date and duration (in hours) of the storm event(s) sampled;
- rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff;
- the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event; and
- an estimate of the total volume (in gallons) of the discharge sampled.

b. Frequency of Monitoring. Sampling shall be conducted at least annually (1 time per year) except as provided by Parts V.B.13. or V.B.14. of this permit.

13. Sample Type. For discharges from holding ponds or other impoundments with a retention period greater than 24 hours, (estimated by dividing the volume of the detention pond by the discharge rate) a minimum of one grab sample may be taken. For all other discharges, data shall be reported for both a grab sample and a composite sample. All samples shall be collected from a discharge resulting from a storm event that is greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. The grab sample shall be taken during the first hour of the discharge. The composite sample shall either be flow-weighted or time-weighted. Composite samples may be taken with a continuous sampler or as a combination of a minimum of three sample aliquots taken in each hour of discharge for the entire discharge or for the first three hours of the discharge, with each aliquot being separated by a minimum period of fifteen minutes. Only grab samples may be collected and analyzed for the determination of pH, temperature, cyanide, total phenols, residual chlorine, fecal coliform, fecal streptococcus, and oil and grease.

14. Sampling Waiver. When a discharger is unable to collect samples due to adverse climatic conditions, the discharger must explain, in writing, why samples could not be collected, including available documentation of the event, and retain a copy of the explanation in accordance with Part V.D of this permit. Adverse climatic conditions which may prohibit the collection of samples include weather that creates dangerous conditions for personnel (e.g., local flooding, high winds, tornadoes, electrical storms) or otherwise make the collection of a sample impracticable (e.g., drought or extended frozen conditions).

15. Representative Discharge. When a facility has two or more outfalls that, based on a consideration of features and activities within the area drained by the outfall, the permittee reasonably believes discharge substantially identical effluents, the permittee may test the effluent of one of such outfalls and report that the quantitative data also applies to the substantially identical outfall(s). In addition, for each outfall that the permittee believes is representative, an estimate of the size of the drainage area (in square feet) and an estimate of the runoff coefficient of the drainage area (e.g. low (under 40%), medium (40% to 65%) or high (above 65%)) shall be provided.

C. NONCOMPLIANCE REPORTING

Permittees that are not required to monitor must report all incidents of non-compliance to the Department at least annually.

D. REPORTING

1. Permittees which are subject to the monitoring requirements of Part IV of this permit are required to submit signed copies of discharge monitoring results on Discharge Monitoring Report Forms(s) within 30 days after the sampling occurred.
2. Except as provided in paragraph D.1. of this part, permittees are not required to submit monitoring results. However, such permittees must retain monitoring results and submit such results to the Department upon request, in accordance with Part V.E. of this permit.
3. **Additional Notification.** Facilities with at least one storm water discharge associated with industrial activity through a municipal separate storm sewer system must submit signed copies of discharge monitoring reports or results to the operator of the municipal separate storm sewer system upon request.

E. RETENTION OF RECORDS

1. For the duration of the permit or for a period of at least three years from the date of the document, the permittee shall retain a copy of the SWPPP, records of all monitoring information, copies of all reports required by this permit, and all records used to complete the NOI.
2. Permittees must submit monitoring results to the Department upon request.

F. ADDRESSES

All written correspondence to the Department shall be emailed to npdes.mail@dnr.iowa.gov or mailed to the following address: Storm Water Coordinator, Iowa Department of Natural Resources, 502 E 9th St., Des Moines IA 50319-0034.

PART VI. STANDARD CONDITIONS

A. ADMINISTRATIVE RULES

Rules of the Department that govern the operation of a facility in connection with this permit are published in volumes 561 and 567 of the IAC. Reference to the term "rule" in this permit means the designated provision of volume 561 or 567.

B. DUTY TO COMPLY

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Iowa Code and the CWA and is grounds for enforcement action; for termination of coverage under this general permit; or for denial of a request for coverage under a reissued general permit. Coverage under this general permit does not relieve the permittee of the responsibility to comply with all local, state and federal laws, ordinances, regulations or other legal requirements.

1. **Toxic Pollutants.** The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the CWA for toxic pollutants, within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.
2. **Penalties for Violations of Permit Conditions.** Section 309 of the CWA provides significant penalties for any person who violates a permit condition implementing sections 301, 302, 306, 307, 308, 318, or 405 of the CWA, or any permit condition or limitation implementing any such sections in a permit issued under section 402. Any person who violates any condition of this permit is subject to a civil penalty and other appropriate sanctions as provided by section 309 of the CWA.

C. CONTINUATION OF THE EXPIRED GENERAL PERMIT

This permit expires on February 29, 2028. However, an expired general permit shall continue in effect until replaced by adoption of a new general permit.

D. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

E. DUTY TO MITIGATE

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

F. DUTY TO PROVIDE INFORMATION

The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine compliance with this permit. The permittee shall also furnish to the Department upon request copies of records required to be kept by this permit.

G. OTHER INFORMATION

When the permittee becomes aware that he or she failed to submit any relevant facts, or submitted incorrect information in the NOI or in any other report to the Department, he or she shall promptly submit such facts or information.

H. SIGNATORY REQUIREMENTS

All NOIs, NODs, SWPPPs, reports, certifications, or information either submitted to the Department or the operator of a large or medium municipal separate storm sewer system, or that this permit requires be maintained by the permittee, shall be signed in accordance with subrule 567 IAC 64.3(8) as follows:

64.3(8) *Identity of signatories of operation permit applications.* The person who signs the application for an operation permit shall be:

- **a.** *Corporations*. In the case of corporations, a responsible corporate officer. A responsible corporate officer means: (1) A president, secretary, treasurer, or vice -president in charge of a principal business function, or any other person who performs similar policy or decision-making functions: or (2) The manager of manufacturing, production or operating facilities, if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- **b.** *Partnerships*. In the case of a partnership, a general partner.
- **c.** *Sole proprietorships*. In the case of a sole proprietorship, the proprietor.
- **d.** *Municipal, state, federal, or other public agency*. In the case of a municipal, state, or other public facility, either the principal executive officer or the ranking elected official. A principal executive officer of a public agency includes: (1) The chief executive officer of the agency, or (2) A senior executive officer having responsibility for the overall operations of a unit of the agency.
- **e.** *Storm water discharge associated with industrial activity from construction activities*. In the case of a storm water discharge associated with construction activity, either the owner of the site or the general contractor.

The person who signs NPDES reports shall be the same, except that in the case of a corporation or a public body, monitoring reports required under the terms of the permit may be submitted by the person who is responsible for the overall operation of the facility from which the discharge originated.

I. CERTIFICATION

Any person signing documents required by this permit shall make 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 known violations.

J. OIL AND HAZARDOUS SUBSTANCE LIABILITY

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under section 311 of the CWA.

K. PROPERTY RIGHTS

The issuance of this permit does not convey any property rights of any sort, nor any exclusive privileges, nor does it authorize any injury to private property nor any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

L. SEVERABILITY

The provisions of this permit are severable. If any provision of this permit is found to be invalid by this Department or a court of law, such a determination shall not affect validity or enforceability of any other permit term or part. Additionally, if the application of any provision to a particular circumstance is found to be invalid by the Department or a court of law, such a determination shall not affect the validity or enforceability of said provision to other circumstances.

M. TRANSFERS

This permit is not transferable to any person except after notice to the Department. The Department may require the operator to apply for and obtain an individual NPDES permit as stated in Part I.C. of this permit.

N. PROPER OPERATION AND MAINTENANCE

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit and with the requirements of SWPPPs. Adequate laboratory controls and appropriate quality assurance procedures shall be provided to maintain compliance with the conditions of this permit.

O. MONITORING AND RECORDS

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. Analyses must be performed by a laboratory certified in Iowa to perform such analyses in conformance with 567 IAC Chapter 83.
2. The permittee shall retain records of all monitoring information including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of the reports required by this permit, and records of all data used to complete the application for this permit for the duration of this permit or three years after the measurement, whichever is later.
3. **Records Contents**. Records of monitoring information shall include all of the following:
   - **a.** The date, exact place, and time of sampling or measurements;
   - **b.** The initials or name(s) of the individual(s) who performed the sampling or measurements;
   - **c.** The date(s) analyses were performed;
   - **d.** The time(s) analyses were initiated;
   - **e.** The initials or name(s) of the individual(s) who performed the analyses;
   - **f.** References and written procedures, when available, for the analytical techniques or methods used; and
   - **g.** The results of the analyses, including, but not limited to, the bench sheets, instrument readout, electronic records, used to determine these results.
4. Monitoring must be conducted according to test procedures specified in 567 IAC Chapter 63 unless other test procedures have been specified in this permit.
5. Section 309 of the CWA provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 2 years per violation, or by both.

P. BYPASS OF TREATMENT FACILITIES

1. Prohibition of Bypass.

a. Bypasses are prohibited. The Department may not asses a civil penalty against a permittee for a bypass if the permittee has complied with all of the following:

a.(1). The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

a.(2). There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment down time. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

a.(3). The permittee submitted notices as required under paragraph P.2.A.(2). of this section.

b. The Department may approve an anticipated bypass after considering its adverse effects, if the Department determines that it will meet the three conditions listed above and a request for bypass has been submitted to the appropriate regional field office of the Department at least ten days prior to the expected event.

2. Notice of bypass.

a. Anticipated bypass. Except for bypasses that occur as a result of mechanical failure or acts beyond the control of the owner or operator (unanticipated bypasses), the permittee shall obtain written permission from the Department prior to any discharge not authorized this permit. The Department may approve an anticipated bypass after considering its adverse effects if the Department determines that it will meet the conditions in 567 IAC 63.6(1).

a.(1). The request for a bypass shall be submitted to the appropriate regional field office of the Department at least ten days prior to the expected date of the event.

a.(2). The request shall be submitted in writing and shall include the reason for the bypass, the date and time the bypass will begin, the expected duration of the bypass, an estimate of the amount of untreated or partially treated sewage or wastewater that will be discharged; the location of the bypass, the name of any body of surface water that will be affected by the bypass; and any actions the owner or operator proposes to take to mitigate the effects of the bypass upon the receiving stream or other surface water.

b. Unanticipated bypass. In the event that a bypass or upset occurs without prior notice having been provided or as a result of mechanical failure or acts beyond the control of the owner or operator, the permittee shall notify the Department by telephone as soon as possible but not later than 24 hours after the onset or discovery.

b.(1). Notification shall be made by contacting the appropriate field office. Notification shall include information on as many items listed in paragraph P.2.A.(2). of this section as available information will allow. When the Department has been notified of an unanticipated bypass, the Department shall determine if a public notice is necessary. If the Department determines that public notification is necessary, the owner or operator of the treatment facility or the collection system shall prepare a public notice.

b.(2). A written submission describing the bypass shall also be provided within five days of the time the permittee becomes aware of the bypass. The written submission shall contain the reason for the bypass, including the amount and duration of any rainfall event that may have contributed to the bypass, the date and time of onset or discovery of the bypass, the duration of the bypass, an estimate of the amount of wastewater that was discharged, the location of the bypass; and the name of any body of surface water that was affected by the bypass.

Q. UPSET CONDITIONS

1. An upset constitutes an affirmative defense to an action brought for noncompliance with technology-based permit limitations if the requirements of paragraph 2 below are met.

2. A permittee who wishes to establish the affirmative defense of an upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence, that:

a. An upset occurred and that the permittee can identify the cause(s) of the upset:

b. The permitted facility was at the time being properly operated;
c. The permittee submitted notice of the upset to the Department; and,
d. The permittee complied with any remedial measures required under Part III.C. of this permit.

3. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

R. INSPECTION AND ENTRY

The permittee shall allow the Department or an authorized representative of EPA, the State, or, in the case of a facility which discharges through a municipal separate storm sewer, an authorized representative of the municipal operator of the separate storm sewer receiving the discharge, upon the presentation of credentials and other documents as may be required by law, to:

1. Enter upon the premises where a regulated facility or activity is located or conducted or where records must be kept under the conditions of this permit;
2. Provide access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
3. Inspect at reasonable times any facilities or equipment (including monitoring and control equipment); and
4. Sample or monitor, at reasonable times, to assure compliance or as otherwise authorized by the CWA.

S. PERMIT ACTIONS

Coverage under this permit may be terminated for cause. The filing of a request by the permittee for a permit discontinuance, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

PART VII. REOPENER CLAUSE

If there is evidence indicating potential or realized impacts on water quality due to any storm water discharge associated with industrial activity covered by this permit, the permittee may be required to obtain an individual permit in accordance with Part I.C. of this permit.

PART VIII. DEFINITIONS

"*Best Management Practices*" or *"BMPs"* means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

"Bypass" means the diversion of waste streams from any portion of a treatment facility or collection system. A bypass does not include internal operational waste stream diversions that are part of the design of the treatment facility, maintenance diversions where redundancy is provided, diversions of wastewater from one point in a collection system to another point in a collection system, or wastewater backups into buildings that are caused in the building lateral or private sewer line.

"Coal pile runoff" means the rainfall runoff from or through any coal storage pile.

"CFR" means the Code of Federal Regulations.

***"CWA"* or "*Clean Water Act*"** means the Federal Water Pollution Control Act.

"Dedicated portable asphalt plant" means a portable asphalt plant that is located on or contiguous to a construction site and that provides asphalt only to the construction site that the plant is located on or adjacent to.

"Dedicated portable concrete plant" means a portable concrete plant that is located on or contiguous to a construction site and that provides concrete only to the construction site that the plant is located on or adjacent to.

"Dedicated sand or gravel operation" means an operation that produces sand and/or gravel for a single construction project.

"Department" means the Iowa Department of Natural Resources.

"*Discharge authorization date*" refers to October 1, 1992 for storm water discharges associated with industrial activity with requirements to apply on or before October 1, 1992. For all other storm water discharges, the discharge authorization date will be the date that the discharge will begin or the date in which all the requirements of Part II.C. of this permit have been met, whichever is later.

"*Flow-weighted composite sample*" means a composite sample consisting of a mixture of aliquots collected at a constant time interval, where the volume of each aliquot is proportional to the flow rate of the discharge.

"Hazardous condition" means any situation involving the actual, imminent, or probable spillage, leakage, or release of a hazardous substance on to the land, into a water of the state, or into the atmosphere, which creates an immediate or potential danger to the public health or safety or to the environment. *Iowa Code 455B.381(4)*

"Hazardous substance" means any substance or mixture of substances that presents a danger to the public health or safety and includes, but in not limited to, a substance that is toxic, corrosive, or flammable, or that is an irritant or that generates pressure through decomposition, heat, or other means. "Hazardous substance" may include any hazardous waste identified or listed by the administrator of the United State Environmental Protection Agency under the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act of 1976, or any toxic pollutant listed under section 307 of the federal Water Pollution Control Act as amended to January 1, 1977, or any hazardous substance designated under section 311 of the federal Water Pollution Control Act as amended to January 1, 1977, or any hazardous material designated by the secretary of transportation under the Hazardous Materials Transportation Act. *Iowa Code 455B.381(5)*

"IAC" means the Iowa Administrative Code.

"Landfill" means an area of land or an excavation in which wastes are placed for permanent disposal, and which is not a land application unit, surface impoundment, injection well, or waste pile.

"Land application unit" means an area where wastes are applied onto or incorporated into the soil surface (excluding manure spreading operations) for treatment or disposal.

"Large and Medium municipal separate storm sewer system" means all municipal separate storm sewers that are either:

1. located in an incorporated place with a population of 100,000 or more as determined by the latest Decennial Census by the Bureau of Census; or
2. located in the counties with unincorporated urbanized populations of 100,000 or more, except municipal separate storm sewers that are located in the incorporated places, townships or towns within such counties; or
3. owned or operated by a municipality other than those described in paragraph (i) or (ii) and that are designated by the Department as part of the large or medium municipal separate storm sewer system.

"Municipality" means a city, town, borough, county, parish, district, association, or other public body created by or under State law.

"NOD" means Notice of Discontinuation (see Part II.F. of this permit.)

"NOI" means Notice of Intent to be covered by this permit (see Part II of this permit.)

"Outstanding Iowa Waters" means those waters which constitute an outstanding state resource such as waters of exceptional recreational or ecological significance. These waters are identified in Appendix B of the Iowa Antidegradation Implementation Procedure manual.

"Outstanding National Resource Waters" means those waters which constitute an outstanding national resource such as waters of national and state parks and wildlife refuges and waters of exceptional recreational or ecological significance. These waters are identified in Appendix B of the Iowa Antidegradation Implementation Procedure manual.

"Qualified personnel" means those individuals capable enough and knowledgeable enough to perform the required functions adequately well to ensure compliance with the relevant permit conditions and requirements of the Iowa Administrative Code.

"Runoff coefficient" means the fraction of total rainfall that will appear at the conveyance as runoff.

"SARA" means the Superfund Amendments and Reauthorization Act of 1986, also titled the Emergency Planning and Community Right-to-Know Act of 1986.

"Section 313 water priority chemical" means a chemical or chemical categories which are:

1. Listed at 40 CFR Section 372.65 pursuant to SARA Title III, Section 313 ;
2. Present at or above threshold levels at a facility subject to SARA Title III, Section 313 reporting requirements; and
3. Meet at least one of the following criteria:
   a. are listed in Appendix D of 40 CFR Part 122 on either Table II (organic priority pollutants), Table III (certain metals, cyanides, and phenols) or Table V (certain toxic pollutants and hazardous substances);
   b. are listed as a hazardous substance pursuant to section 311(b)(2)(A) of the CWA at 40 CFR Section 116.4; or
   c. are pollutants for which EPA has published acute or chronic water quality criteria.

"Severe Property Damage" means substantial physical damage to property, damage to treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

"Storm Water" means storm water runoff, snow melt runoff, and surface runoff and drainage.

"Storm water discharge associated with industrial activity" means the discharge from any conveyance that is used for collecting and conveying storm water and that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant. The term does not include discharges from facilities or activities excluded from the NPDES program under 40 CFR Part 122. For the categories of industries identified in this definition, the term includes, but is not limited to, storm water discharges from industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters (as defined at 40 CFR Part 401); sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and final products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water.

For the purposes of this definition, material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product, by-product, or waste

product. The term excludes areas located on plant lands separate from the plant's industrial activities, such as office buildings and accompanying parking lots as long as the drainage from the excluded areas is not mixed with storm water drained from the above described areas. Industrial facilities (including industrial facilities that are Federally, State, or municipally owned or operated) that meet the description of the facilities listed in these paragraphs (i) to (xi) of this definition) include those facilities designated under 40 CFR Section 122.26(a)(1)(v). The following categories of facilities are considered to be engaging in "industrial activity" for purposes of this definition:

(i) Facilities subject to storm water effluent limitations guidelines, new source performance standards, or toxic pollutant effluent standards under 40 CFR Subchapter N (except facilities with toxic pollutant effluent standards which are exempted under paragraph (xi) of this definition);

(ii) Facilities classified within Standard Industrial Classification 24, Industry Group 241 that are rock crushing, gravel washing, log sorting, or log storage facilities operated in connection with silvicultural activities defined in 40 CFR Sections 122.27(b)(2)-(3) and Industry Groups 242 through 249; 26 (except 265 and 267), 28 (except 283), 29, 311, 32 (except 323), 33, 3441, 373; (not included are all other types of silviculture facilities);

(iii) Facilities classified as Standard Industrial Classifications 10 through 14 (mineral industry) including active or inactive mining operations (except for areas of coal mining operations no longer meeting the definition of a reclamation area under 40 CFR Section 434.11(1) because the performance bond issued to the facility by the appropriate SMCRA authority has been released, or except for areas of non-coal mining operations which have been released from applicable state or federal reclamation requirements after December 17, 1990) and oil and gas exploration, production, processing, or treatment operations, or transmission facilities that discharge storm water contaminated by contact with or that has come into contact with, any overburden, raw material, intermediate products, finished products, by-products or waste products located on the site of such operations; (inactive mining operations are mining sites that are not being actively mined, but which have an identifiable owner/operator; inactive mining sites do not include sites where mining claims are being maintained prior to disturbances associated with the extraction, beneficiation, or processing of mined materials, nor sites where minimal activities are undertaken for the sole purpose of maintaining a mining claim);

(iv) Hazardous waste treatment, storage, or disposal facilities, including those that are operating under interim status or a permit under Subtitle C of the Resource Conservation and Recovery Act (RCRA);

(v) Landfills, land application sites, and open dumps that receive or have received any industrial wastes (waste that is received from any of the facilities described under this definition) including those that are subject to regulation under Subtitle D of RCRA;

(vi) Facilities involved in the recycling of materials, including metal scrap yards, battery reclaimers, salvage yards, and automobile junkyards, including, but not limited to, those classified as Standard Industrial Classifications 5015 and 5093;

(vii) Steam electric power generating facilities, including coal handling sites;

(viii) Transportation facilities classified as Standard Industrial Classifications 40, 41, 42 (except 4221-4225), 43, 44, 45 and 5171 which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations. Only those portions of the facility that are either involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, airport deicing operations, or which are otherwise identified under paragraphs (i) to (vii) or (ix) to (xi) of this definition are associated with industrial activity;

(ix) Treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system used in the storage, treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated to the disposal of sewage sludge that are located within the confines of the facility, with a design flow of 1.0 mgd or more, or required to have an approved pretreatment program under 40 CFR Part 403. Not included are farmlands, domestic gardens or lands used for sludge management where sludge is beneficially reused and which are not physically located in the confines of the facility, or areas that are in compliance with section 405 of the CWA;

(x) Construction activity including clearing, grading and excavation, except operations that result in the disturbance of less than one acre of total land area. Construction activity also includes the disturbance of less

than one acre of total land area that is a part of a larger common plan of development or sale if the larger common plan will ultimately disturb one acre or more;

(xi) Facilities under Standard Industrial Classifications 20, 21, 22, 23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 311), 323, 34 (except 3441), 35, 36, 37 (except 373), 38, 39, and 4221-4225.

*"**Storm water discharge associated with industrial activity from asphalt plants, concrete batch plants and rock crushing plants**"* means storm water discharge associated with industrial activity from facilities engaged in manufacturing asphalt paving mixtures and which are classified under Standard Industrial Classification 2951, primarily engaged in manufacturing portland cement concrete delivered to a purchaser in a plastic and unhardened state and which is classified under Standard Industrial Classification 3273 and those facilities which are classified under Standard Industrial Classifications 1422 or 1423 which are primarily engaged in the crushing, grinding or pulverizing of limestone or granite.

"Storm water discharge associated with industrial activity for construction activities" means storm water discharges from activities that fall under subparagraph (x) in the definition of storm water discharge associated with industrial activity.

"SWPPP" means storm water pollution prevention plan.

"10-year, 24-hour precipitation event" means the maximum 24-hour precipitation event with a probable reoccurrence interval of once in 10 years. This information is available in "Weather Bureau Technical Paper No. 40,", May 1961 and may be obtained from the National Climatic Center of the Environmental Data Service, National Oceanic and Atmospheric Administration, U.S. Department of Commerce.

"*Time-weighted composite*" means a composite sample consisting of a mixture of equal volume aliquots collected at a constant time interval.

"Uncontaminated groundwater" means water that is potable for humans, meets the narrative water quality standards in subrule 567 IAC 61.3(2), contains no more than half the listed concentration of any pollutants in subrule 567 IAC 61.3(3), has a pH of 6.5-9.0, and is located in soil or rock strata.

"Uncontrolled sanitary landfill" means a landfill or open dump, whether in operation or closed, that does not meet the requirements for runon or runoff controls established pursuant to subtitle D of the Solid Waste Disposal Act.

"Water(s) of the State" means any stream, lake, pond, marsh, watercourse, waterway, well, spring, reservoir, aquifer, irrigation system, drainage system and any other body or accumulation of water, surface or underground, natural or artificial, public or private which are contained within, flow through or border upon the State of Iowa or any portion thereof.

Appendix C: Pollution Prevention Team

Iowa Department of Natural Resources

General Permit # 1 Worksheet

Worksheet #1

Completed by: _____ Title: _____

Date: _____

Pollution Prevention Team Member Roster

Leader: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 1: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 2: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 3: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 4: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 5: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 6: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 7: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Appendix D: Non-Storm Water Discharge Assessment and Certification

Worksheet #6

Completed by: _____ Title: _____ Date: _____

Non-Storm Water Discharge Assessment and Certification

Date of Test or Evaluation	Outfall Directly Observed During the Test (identify as indicated on the site map)	Method Used to test or Evaluate Discharge	Describe Results from Test for the Presence of Non-Storm Water Discharge	Identify Potential Significant Sources	Name of Person Who Conducted the Test or Evaluation

Certification

I, _____ (responsible corporate official), 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.

(Type or Print)

Name & Official Title: _____ Area Code and Phone Number: _____

Signature: _____ Date Signed: _____

Worksheet #6

Completed by: _____ Title: _____ Date: _____

Non-Storm Water Discharge Assessment and Failure to Certify Notification

Instructions: If you cannot feasibly test or evaluate an outfall within 180 days of the discharge authorization date, fill in the table below with the appropriate information and sign this form to certify the accuracy of the included information.

List all outfalls not tested or evaluated, describe any potential sources of non-storm water pollution from listed outfalls, and state the reason(s) why certification is not possible. Use the key from your site map to identify each outfall.

Important Notice: A copy of this notification must be signed and kept onsite and made available to the Iowa Department of Natural Resources upon request.

Identify Outfall Not Tested or Evaluated	Description of Why Certification is Infeasible	Description of Potential Sources of Non-Storm Water Pollution

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 ensure 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. Such notification will be kept onsite and made available to the Iowa Department of Natural Resources anytime, after 180 from the discharge authorization date, if non-storm water certification cannot be provided.

(Type or Print)

Name & Official Title: _____ Area Code and Phone Number: _____

Signature: _____ Date Signed: _____

Appendix E: List of Significant Spills and Leaks

Worksheet #5

Completed by: _____ Title: _____ Date: _____

History of "Hazardous Condition" Reporting

Instructions: Record below all spills and leaks of toxic or hazardous pollutants, which resulted in a "hazardous condition" that have occurred at the facility since October 1, 1989.

Date (MM/DD/YYYY)	Name of Material	Location (as indicated on the site map)	Reason for Spill or Leak	Preventative Measure(s) Taken to Prevent Reoccurrence of Spill or Leak

Appendix F: Annual Inspection Worksheets

Worksheet #7

Completed by: _____ Title: _____ Date: _____

Site Evaluation Summary

Instructions: List all identified storm water pollutant sources and describe existing management practices that address these sources.

Activity	Storm Water Pollutant Source	Pollutants of Concern (from existing information of estimation)	Describe Existing BMPs (pollution prevention measures)	Description of New BMP Options (identify BMP options for eliminating remaining sources of pollutants)
Loading / Unloading Operations				
Maintenance Operations / Equipment Cleaning Operations				
Outdoor Storage Operations				
Onsite Practices				

Worksheet #7

Completed by: _____ Title: _____ Date: _____

Site Evaluation Summary

Instructions: List all identified storm water pollutant sources and describe existing management practices that address these sources.

Activity	Storm Water Pollutant Source	Pollutants of Concern (from existing information of estimation)	Describe Existing BMPs (pollution prevention measures)	Description of New BMP Options (identify BMP options for eliminating remaining sources of pollutants)
Dust or Particulate Generating Processes				
Above ground Liquid Storage Tanks				
Outdoor Manufacturing and / or Process Operations				
Others				

Worksheet #8

Completed by: _____ Title: _____ Date: _____

Best Management Practice (BMP) Identification

Instructions: Describe the Best Management Practices that you have selected to include in your pollution prevention plan. Also describe any additional BMPs (activity specific and site specific BMPs) that you have selected from Worksheet #7. For each of the BMPs, describe actions that will be incorporated into facility operations. Attach additional sheets if necessary.

BMPs	Brief Description of Activities
Good Housekeeping	
Preventative Maintenance	
Visual Inspections	
Spill Prevention Response	
Sediment and Erosion Control	
Storm water Management - Runon	
Storm Water Management - Runoff	
Additional BMPs (Activity specific and site specific chosen from Worksheet #7)	
Employee Training	

Appendix G: Completed Annual Site Inspection Worksheets

Appendix H: Employee Training Records

Employee Training Procedure

Location: **Independence Airport**	Standard Operating Procedure	Document Organizer: _____
Title: Storm Water Pollution Prevention Plan (SWPPP) Employee Training	Effective Date:	Latest Revision:

1. Purpose:

The purpose of a training program is to teach personnel at all levels of responsibility the components of the SWPPP. When properly trained, personnel are more capable of preventing spills, responding safely and effectively to spills, and recognizing situations that could lead to spills.

2. Scope:

Who to Train:

- Train all new employees initially, then annually those who:
  - work with materials or activities that are exposed to stormwater
  - use or update the Stormwater Pollution Prevention Plan (SWPPP)
  - maintain and repair the stormwater management methods, known as Best Management Practices (BMPs)
  - annual visual outdoor site inspections required by the industrial stormwater permit

3. Procedures: ***Basic Protocol:***

- When to train:
  - Train new employees as soon as possible.
  - Conduct or send employees to refresher training on an annual or more frequent basis as appropriate.
  - The amount and frequency of training will depend on the complexity of the facility's BMPs, turn-over rate for employees and effectiveness of prior training.

- Document employee training:
  - Establish in the facility's SWPPP how often training will be held and what topics it will cover.
  - All training records including the trainer's name and organization (whether internal or external), the names of trained employees, topics covered, and dates of the trainings will be kept in the Human Resources office.

- Topics to cover:
  - At a minimum, training must cover:
    - purpose of the SWPPP
    - contents and requirements of the SWPPP, including spill control and cleanup
    - how to use and update the SWPPP
    - how the stormwater management methods/BMPs work and will be maintained
    - how and where to take stormwater samples

4. Responsibilities: _____

5. Approvals: _____

Training Roster

Type of Training: _____

Date: _____

Printed Name	Signature

Appendix I: Materials Inventory

Worksheet #3

Completed by: _____ Title: _____ Date: _____

Material Inventory

Instructions: List all significant materials used, stored, handled, disposed, processed, or produced onsite. Assess and evaluate these materials for their potential to contribute pollutants to storm water runoff. Also, complete Worksheet 3A if the material has been exposed during the last 3 years.

Name of Material	Where is it located?	Quantity (units)			What is the likelihood of contact with the storm water? What conditions would cause contact with storm water? Explain.	Has any of this material been exposed to storm water in the last three years? (Yes or No)
		Used	Produced	Discharged		
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No

Worksheet #4

Completed by: _____ Title: _____ Date: _____

Description of Exposed Significant Material

Instructions: Based on your material inventory, describe the significant materials that were exposed to storm water during the past three years and/or are currently exposed.

Description of Exposed Significant Material	Period of Exposure	Quantity Exposed (units)	Location (as indicated on the site map)	Method of Storage or Disposal (e.g. pile, drum, tank)	Material Management Practices Used (Provide a narrative description of the materials management practices used that either: minimized contact with storm water, serve as structural or non-structural control measures to reduce pollutants in storm water, or treat storm water)

Appendix J: Superseded Pages

Appendix K: Facility Site Maps

Independence Airport SWPPP

City of Independence

Facility SWPPP Site Map

October 2024

BOLTON & MENK

OUT-3

OUT-1

OUT-2

NON-STORMWATER SAMPLING LOCATION

Taxiway

Runway

Legend

- Drainage Area
- Outlet
- Drainage Arrow
- Storm Sewer
- Contour

0 1,000 Feet

Source: City of Independence

Independence Airport SWPPP

City of Independence

Buildings SWPPP Site Map

October 2024

BOLTON & MENK

North Apron

Terminal

SRE Building

Aircraft Refueling Area

South Apron

Box Hangar

Maintenance Hangar

T-Hangars

N-STORMWATER SAMPLING LOCATION

Legend

- Drainage Arrow
- Contour
- Drainage Area
- Outlet
- Storm Sewer

0 200 Feet

Source: City of Independence

Appendix L: Blank Worksheets

Iowa Department of Natural Resources

General Permit # 1 Worksheet

Worksheet #1

Completed by: _____ Title: _____

Date: _____

Pollution Prevention Team Member Roster

Leader: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 1: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 2: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 3: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 4: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 5: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 6: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Member 7: _____ Title: _____

Office Phone: _____

Responsibilities: _____

Worksheet #6

Completed by: _____ Title: _____ Date: _____

Non-Storm Water Discharge Assessment and Certification

Date of Test or Evaluation	Outfall Directly Observed During the Test (identify as indicated on the site map)	Method Used to test or Evaluate Discharge	Describe Results from Test for the Presence of Non-Storm Water Discharge	Identify Potential Significant Sources	Name of Person Who Conducted the Test or Evaluation

Certification

I, _____ (responsible corporate official), 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.

(Type or Print)

Name & Official Title: _____ Area Code and Phone Number: _____

Signature: _____ Date Signed: _____

Worksheet #6

Completed by: _____ Title: _____ Date: _____

Non-Storm Water Discharge Assessment and Failure to Certify Notification

Instructions: If you cannot feasibly test or evaluate an outfall within 180 days of the discharge authorization date, fill in the table below with the appropriate information and sign this form to certify the accuracy of the included information.

List all outfalls not tested or evaluated, describe any potential sources of non-storm water pollution from listed outfalls, and state the reason(s) why certification is not possible. Use the key from your site map to identify each outfall.

Important Notice: A copy of this notification must be signed and kept onsite and made available to the Iowa Department of Natural Resources upon request.

Identify Outfall Not Tested or Evaluated	Description of Why Certification is Infeasible	Description of Potential Sources of Non-Storm Water Pollution

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 ensure 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. Such notification will be kept onsite and made available to the Iowa Department of Natural Resources anytime, after 180 from the discharge authorization date, if non-storm water certification cannot be provided.

(Type or Print)

Name & Official Title: _____ Area Code and Phone Number: _____

Signature: _____ Date Signed: _____

Worksheet #5

Completed by: _____ Title: _____ Date: _____

History of "Hazardous Condition" Reporting

Instructions: Record below all spills and leaks of toxic or hazardous pollutants, which resulted in a "hazardous condition" that have occurred at the facility since October 1, 1989.

Date (MM/DD/YYYY)	Name of Material	Location (as indicated on the site map)	Reason for Spill or Leak	Preventative Measure(s) Taken to Prevent Reoccurrence of Spill or Leak

Worksheet #7

Completed by: _____ Title: _____ Date: _____

Site Evaluation Summary

Instructions: List all identified storm water pollutant sources and describe existing management practices that address these sources.

Activity	Storm Water Pollutant Source	Pollutants of Concern (from existing information of estimation)	Describe Existing BMPs (pollution prevention measures)	Description of New BMP Options (identify BMP options for eliminating remaining sources of pollutants)
Loading / Unloading Operations				
Maintenance Operations / Equipment Cleaning Operations				
Outdoor Storage Operations				
Onsite Practices				

Worksheet #7

Completed by: _____ Title: _____ Date: _____

Site Evaluation Summary

Instructions: List all identified storm water pollutant sources and describe existing management practices that address these sources.

Activity	Storm Water Pollutant Source	Pollutants of Concern (from existing information of estimation)	Describe Existing BMPs (pollution prevention measures)	Description of New BMP Options (identify BMP options for eliminating remaining sources of pollutants)
Dust or Particulate Generating Processes				
Above ground Liquid Storage Tanks				
Outdoor Manufacturing and / or Process Operations				
Others				

Worksheet #8

Completed by: _____ Title: _____ Date: _____

Best Management Practice (BMP) Identification

Instructions: Describe the Best Management Practices that you have selected to include in your pollution prevention plan. Also describe any additional BMPs (activity specific and site specific BMPs) that you have selected from Worksheet #7. For each of the BMPs, describe actions that will be incorporated into facility operations. Attach additional sheets if necessary.

BMPs	Brief Description of Activities
Good Housekeeping	
Preventative Maintenance	
Visual Inspections	
Spill Prevention Response	
Sediment and Erosion Control	
Storm water Management - Runon	
Storm Water Management - Runoff	
Additional BMPs (Activity specific and site specific chosen from Worksheet #7)	
Employee Training	

Employee Training Procedure

Location: **Independence Airport**	Standard Operating Procedure	Document Organizer: _____
Title: Storm Water Pollution Prevention Plan (SWPPP) Employee Training	Effective Date:	Latest Revision:

1. Purpose:

The purpose of a training program is to teach personnel at all levels of responsibility the components of the SWPPP. When properly trained, personnel are more capable of preventing spills, responding safely and effectively to spills, and recognizing situations that could lead to spills.

2. Scope:

Who to Train:

- Train all new employees initially, then annually those who:
  - work with materials or activities that are exposed to stormwater
  - use or update the Stormwater Pollution Prevention Plan (SWPPP)
  - maintain and repair the stormwater management methods, known as Best Management Practices (BMPs)
  - annual visual outdoor site inspections required by the industrial stormwater permit

3. Procedures: ***Basic Protocol:***

- When to train:
  - Train new employees as soon as possible.
  - Conduct or send employees to refresher training on an annual or more frequent basis as appropriate.
  - The amount and frequency of training will depend on the complexity of the facility's BMPs, turn-over rate for employees and effectiveness of prior training.

- Document employee training:
  - Establish in the facility's SWPPP how often training will be held and what topics it will cover.
  - All training records including the trainer's name and organization (whether internal or external), the names of trained employees, topics covered, and dates of the trainings will be kept in the Human Resources office.

- Topics to cover:
  - At a minimum, training must cover:
    - purpose of the SWPPP
    - contents and requirements of the SWPPP, including spill control and cleanup
    - how to use and update the SWPPP
    - how the stormwater management methods/BMPs work and will be maintained
    - how and where to take stormwater samples

4. Responsibilities: _____

5. Approvals: _____

Training Roster

Type of Training: _____

Date: _____

Printed Name	Signature

Worksheet #3

Completed by: _____ Title: _____ Date: _____

Material Inventory

Instructions: List all significant materials used, stored, handled, disposed, processed, or produced onsite. Assess and evaluate these materials for their potential to contribute pollutants to storm water runoff. Also, complete Worksheet 3A if the material has been exposed during the last 3 years.

Name of Material	Where is it located?	Quantity (units)			What is the likelihood of contact with the storm water? What conditions would cause contact with storm water? Explain.	Has any of this material been exposed to storm water in the last three years? (Yes or No)
		Used	Produced	Discharged		
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No
						☐ Yes ☐ No

Worksheet #4

Completed by: _____ Title: _____ Date: _____

Description of Exposed Significant Material

Instructions: Based on your material inventory, describe the significant materials that were exposed to storm water during the past three years and/or are currently exposed.

Description of Exposed Significant Material	Period of Exposure	Quantity Exposed (units)	Location (as indicated on the site map)	Method of Storage or Disposal (e.g. pile, drum, tank)	Material Management Practices Used (Provide a narrative description of the materials management practices used that either: minimized contact with storm water, serve as structural or non-structural control measures to reduce pollutants in storm water, or treat storm water)

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	City Council
FROM:	Matthew R. Schmitz, MPA - City Manager
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Lover's Lane – Streetlighting

DISCUSSION:

At the November 25th City Council Regular Meeting, a Council Member asked for this item to be added to the agenda.

In the past, Staff has asked ILPT to prepare a cost estimate to install Street Lighting along Lover's Lane. The cost was estimated at $15,000 in parts, with ILPT providing the labor in-kind (a value of $13,460). These costs were put together in August 2023, so I would suggest budgeting at least $17,500. It is planned to be included in the FY2026 budget, but it may not complete the process due to revenue constraints.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	City Council
FROM:	Matthew R. Schmitz, MPA - City Manager
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Speed Education Devices (Signage)

DISCUSSION:

Residents along 2nd Ave. NE have asked about what can be done to help reduce speed along 2nd Ave., from 1st Street East to the Fairgrounds. As Staff has thought about this, and other areas in town where speed enforcement is difficult, we've considered adding educational signage that alerts drivers to speeding, such as this:

Staff would like to talk with the council about options for installing signage like this along 2nd Ave. NE, as well as possibly other areas in town, such as 6th Ave. SW.

These signs cost approximately $5,000 each, so for one location along a street, it would cost $10,000.

A program through the State DOT would pay for these to be installed along 150 Hwy on the north and south sides of town at zero cost to the City, so long as the City agrees to take over the maintenance of them after they are installed. However, that program would not pay for signage such as this along non-state highway routes.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	City Council
FROM:	Matthew R. Schmitz, MPA - City Manager
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Yard Waste Burning (IMC 105.05, Item 2B.)

DISCUSSION:

A resident contacted the mayor asking what could be done to stop Yard Waste Burning (referred to in IMC 105.05, Item 2B. as “Backyard Burning”), which can occur from April 1st through 30th and October 15th through Nov. 14th.

Modification of this regulation would be an Ordinance Change, but before Staff prepares such an ordinance, we recommend discussion amongst the Council about this practice and what the Council would like to see in such a resolution.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	Matthew R. Schmitz, MPA - City Manager
FROM:	Susi Lampe, IaCMC, IaCFO – Assistant City Manager/City Clerk/Treasurer
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Fiscal Year 2026 Budget Timeline

DISCUSSION:

This is to inform the City Council and Staff of the Budget Timeline so that they can plan accordingly.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

FY2026 BUDGET CALENDAR

(July 1, 2025 – June 30, 2026)

September 30, 2024 – Budget worksheets to Departments

December 2, 2024– Draft Department Budgets submitted to City Clerk

January 6, 2025 – CIP Review

January 13, 2025 – Regular Council Meeting

January 20, 2025 – Budget Work Session

January 27, 2025 or February 10, 2025 – Set Maximum Property Tax Hearing for March 24, 2025, at 4:45 pm

> Publication notice is no less than 10 days (3/14/25) and no more than 20 days (3/4/25) before March 24, 2025. Notice goes on City website and Facebook. **Proof of Publication goes to Auditor.**

February 3, 2025 – Committee of the Whole/Budget Work Session

March 1, 2025 – Proposed Property Tax Levy tab of budget is due to IA Dept of Mgmt. so County can mail notices.

March 24, 2025 – 4:45 pm Special Council Meeting - Maximum Property Tax Hearing

March 24, 2025 – 5:00 pm Regular Council Meeting - Set Budget Hearing for April 14, 2025, at 4:45 pm

> Publication notice is no less than 10 days (4/4/25) and no more than 20 days (3/25/25) before April 14, 2025. Notice also goes on City website and Facebook. **Proof of Publication goes to Auditor.**

April 14, 2025 – 4:45 pm Special Council Meeting Budget Hearing

April 14, 2025 – 5:00 pm Regular Council Meeting - First opportunity to modify budget OR adopt budget as is.

> IF NOT APPROVED, Publication notice is same as above and HAS TO BE PUBLISHED ON 4/18/25 TO BE IN COMPLIANCE *I need to double check on this. I think it only applies if rate goes up.*

April 28, **2025** – Last opportunity to modify budget and MUST BE ADOPTED

April 30, 2025 – **Submit Budget to County Auditor. Budget copy must be signed before turning in.**

****DATES SUBJECT TO CHANGE AS MORE IS LEARNED ON NEW BUDGET PROCESS****

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	City Council
FROM:	Matthew R. Schmitz, MPA - City Manager and Susi Lampe – Assistant City Manager / City Clerk / Treasurer
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Finance Software Transition

DISCUSSION:

gWorks has informed us that we have until the end of 2025 to start the conversion to their new cloud-based version. We believe if we have not started the transition by then, they will no longer support the on-premise version of our software.

With that in mind, Staff has started reviewing other options. To date, the Edmunds GovTech proposal attached seems to be the best option to move forward, given the known costs of other software products available on the market.

In the calendar year 2023, we paid $13,584 for gWorks. In the calendar year 2024, we paid $21,357.00, an increase of $7,773 or 57.22%. The attached proposal outlines a complete first-year cost of $47,500; however, annual costs are $26,750. Given gWorks' new pricing, moving to Edmunds—a fully developed, tested product with users throughout the United States—is an increase of only $5,393.00. The additional costs for gWorks for this year were amended in Budget Amendment #1. Funds from additional revenue for interest and property taxes received were used to offset the increased IT line item that pays for this software.

Staff would like to start this transition as soon as possible and split the additional costs between existing funds allocated within the CIP for City Hall and the remaining costs to be budgeted for in FY2026 within the IT line item. Budget authority for the initial payment would be allocated during Budget Amendment #2, which is planned for early spring.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

gWorks

Please remit payments to:

gWorks
PO Box 847636
Boston MA 02284-7636

FROM

3905 South 148th St.,
Ste 200
Omaha, NE 68144

BILL TO

1663-City of Independence IA
ATTN: ACCOUNTS PAYABLE
331 1ST ST. E
INDEPENDENCE, IA 50644-2814
cityclerk@independenceia.org

INVOICE NUMBER	2019-26651
DATE	11/13/2024
DUE DATE	12/31/2024
BALANCE DUE (USD)	**$ 21,357.00**

DESCRIPTION	QUANTITY	RATE	AMOUNT
Annual Subscription for SimpleCity FAM for the term starting 01/01/2025 and ending 12/31/2025 (Includes Annual License Fee and Product Support Agreement)	1	$ 17,278.00	$17,278.00
Annual Subscription for FrontDesk Basic for 700 Active Public Users for the term starting 01/01/2025 and ending 12/31/2025	1	$ 4,079.00	$4,079.00
		BALANCE DUE (USD)	**$ 21,357.00**

2024 $
$10,005
Same
plus $500 credit
$13,584

Thank you for being part of the 84% of our clients who pay their bills on time! We appreciate and thank you for your business!

For billing inquiries, please contact 402-436-2150 or by email at ar@gworks.com.

GIS Workshop, LLC doing business as gWorks

gWorks
SMARTER | STRONGER | SIMPLER

October 29, 2024

Dear Valued Client,

As we approach the end of 2024, I want to express my sincere gratitude for your partnership and trust in gWorks. Since 1978, our software, SimpleCity, has reliably served communities like yours. Over the years, you've shared invaluable feedback with us, helping us evolve SimpleCity into something even better with the next version: gWorks Cloud.

When we acquired Data Tech, our clients told us they needed three key improvements. First, they wanted better support. We delivered, reducing the average resolution time from over a week to less than a day. Second, they asked us to fix bugs and add long-awaited enhancements. We responded, improving stability and delivering more upgrades in two years than Data Tech had in the previous decade. Finally, hundreds of clients told us through surveys, interviews, and focus groups that SimpleCity felt outdated and difficult to use. You asked for a modern, easy-to-learn platform that could help you manage your local government more efficiently, securely, and from anywhere. We heard you.

From your feedback and to address the changing needs of local governments, we took action. That's why we developed gWorks Cloud—the next generation of SimpleCity—a modern, integrated platform built over five years with $15 million in dedicated investment and shaped by input from clients like you. Your input has been instrumental in shaping its design and functionality. In our discussions with customers and other software providers, we've consistently heard gWorks Cloud is unparalleled in its capabilities and impact in client workflows.

gWorks Cloud offers a streamlined experience with a robust suite of features built to simplify workflows, enhance accessibility, and support future growth in ways SimpleCity simply cannot. No more hardware upgrades, complicated IT upkeep, or data backups! gWorks Cloud takes care of all maintenance and updates on our end so you can focus on what matters. With gWorks Cloud, your organization gains the same trusted functionality, now elevated by a modern, user-friendly system. All your essential tools and data are integrated into one secure, centralized platform, enabling you to access everything you need quickly, efficiently, and with complete peace of mind.

With gWorks Cloud, you'll continue to have support from our dedicated Client Success Teams, in-app resources such as knowledge articles and guides, and–coming soon–future AI support bots to enhance your experience. You'll also continue to benefit from webinars and access to gWorks University for training. And as it has been before, your continued feedback and engagement for enhancements in this next version of SimpleCity will be welcomed. Client feedback has been instrumental, enabling us to release 50 enhancements to gWorks Cloud this year to continually improve the experience and the value the user receives.

We aim to upgrade all SimpleCity clients to equivalent functionality in gWorks Cloud by the end of 2025. The great news? Your 2025 SimpleCity renewal price will remain your set rate for gWorks Cloud, with no additional increase unless you add new capabilities. We're also waiving implementation fees during this transition, saving you $3,000 to $15,000. And if you sign the upgrade document by March 31, 2025, we'll lock in that rate through 2026 (unless you add additional capabilities now or later), providing you with

gWorks
SMARTER | STRONGER | SIMPLER

value and predictability as you transition. After you upgrade, you can purchase a read-only license to your historical SimpleCity data. Your existing MSA, terms and conditions, and product support remain in place for SimpleCity.

As it relates to the legacy SimpleCity, its multi-decade old technology has become increasingly complex and costly to maintain, especially as government regulations and technology demands evolve rapidly and available engineering and support resources become scarcer. To keep supporting this platform, we must adjust your renewal price to reflect these realities. Rest assured, we remain committed to providing the updates and customer support you rely on during this transition period.

In the meantime, to maintain uninterrupted service, please submit payment for your 2025 SimpleCity renewal by the invoice due date. Additionally, a gWorks Account Manager will reach out to discuss your organization's move to gWorks Cloud, ensuring a smooth and timely upgrade. In addition, we will be sending a series of emails containing product information and hosting online Q&A webinars. We invite you to visit http://www.gworks.com/products/simplecity for more information.

We deeply value your partnership and are here to make this transition as seamless as possible. Your commitment to serving your community inspires us at gWorks, and we look forward to supporting you with the tools, technology, and people that make your work easier and more effective.

With deep appreciation,
Joseph Heieck
CEO
gWorks

gWorks Cloud

Finance Payroll Utilities Engagement Operations Mapping

The Tools You Know, Streamlined in the Cloud

"The best feature of gWorks Cloud is that it's easy to use and follow! It makes the program simple to use."

Simple User Experience

Everything you rely on in SimpleCity is now faster, more intuitive, with fewer steps.

One Connected System

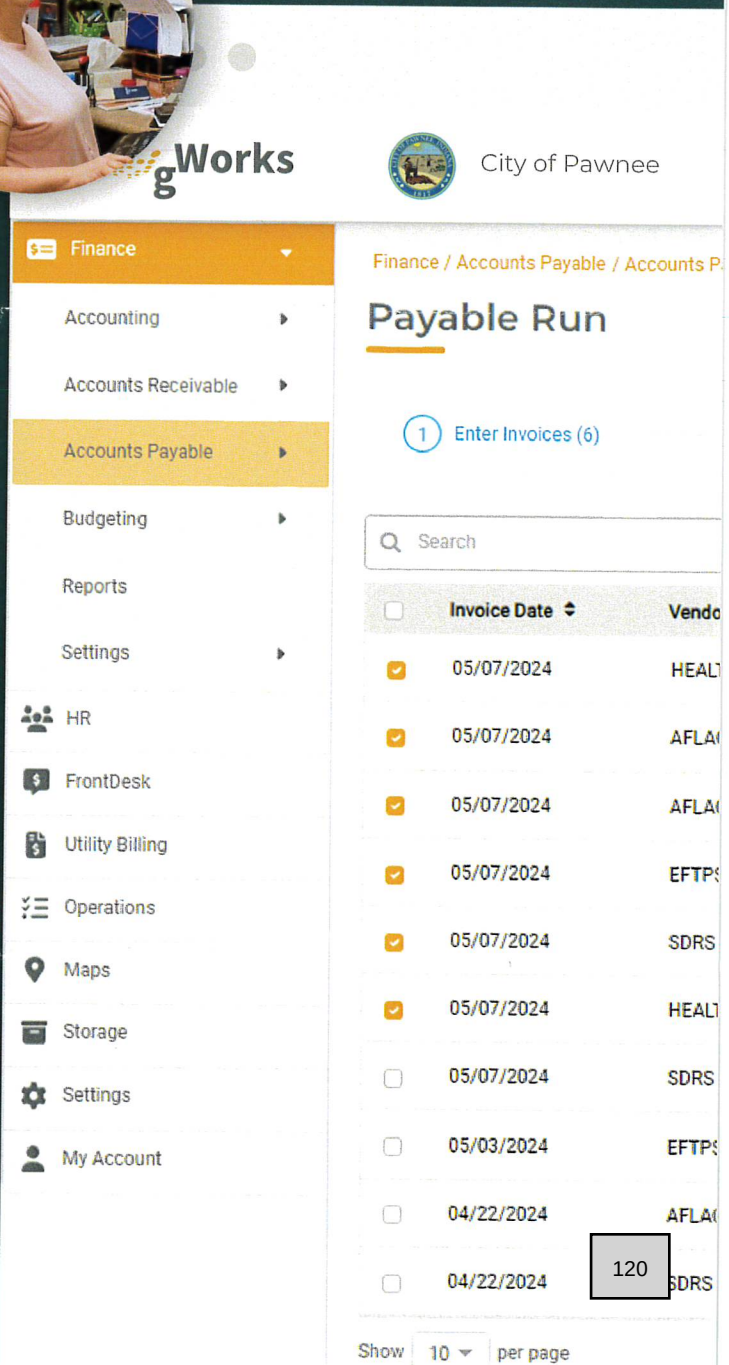
Access all the tools you need in one cloud-based system built from customer feedback.

Real-Time Updates

Information updates automatically, giving you real-time visibility.

Built to Grow With You

All your current functionality, plus user-driven enhancements so you're ready for what's next.



edmunds GovTech

SALES PROPOSAL

Prepared exclusively for:
Independence City, IA

Prepared By:
Proposal Date:11/22/2024
Expiration Date:01/31/[illegible]

Investment Summary

Software Services - Subscription	$23,250.00
Hosting Services	$3,500.00
Professional Services - Implementation	$18,000.00
Conversion Services	$2,750.00
Total Proposed Year 1 Cost:	**$47,500.00**

Payment Terms

One-time Implementation Fees: 50% will be due upon execution of the contract, 25% will be invoiced 60 days after the Effective Date and the remaining 25% will be invoiced upon the earlier of project acceptance or first production use.

One-time Data Conversion Fees: 50% will be due upon execution of the contract, 25% will be invoiced 60 days after the Effective Date and the remaining 25% will be invoiced upon the earlier of project acceptance or first production use.

Hosting Services Fees: 100% will be invoiced on the Effective Date for the first annual term. Thereafter, 100% of each subsequent annual fee will be invoiced annually, 60 days prior to each anniversary of the Effective Date.

Annual Subscription Fees: 100% will be invoiced upon execution of the contract for the first annual term. Thereafter, 100% of each subsequent annual fee will be invoiced annually, 60 days prior to the anniversary of the term date.

All invoices shall be paid within 30 days of the invoice date. Fees may increase annually with renewal terms subject to the National Consumer Price Index (CPI) or four percent (4%) of prior year's fees.

Please return executed Sales Orders
via DocuSign or Email to:
Edmunds GovTech
SalesOrders@EdmundsGovTech.com
P: 888.336.6999 | F: 609.645.3111
www.EdmundsGovTech.com

Software Services - Subscription	Amount
AR & Business Licensing - 3 Year	$3,000.00
Electronic Requisitions - 3 Year	$2,000.00
Finance Super Suite - 3 Year	$5,500.00
Finance ViewPoint Dashboard - 3 Year	$2,500.00
Municipal Dashboard - 3 Year	$2,000.00
Online Bill Pay (WIPP) - AR - 3 Year	$750.00
Online Bill Pay (WIPP) - Misc. - 3 Year	$750.00
Online Bill Pay (WIPP) - Parks & Rec - 3 Year	$750.00
Parks & Recreation Facilities - 3 Year	$1,500.00
Parks & Recreation Memberships - 3 Year	$1,500.00
Parks & Recreation Programs - 3 Year	$1,500.00
Parks & Recreation Rentals - 3 Year	$1,500.00
Annual Fees:	**$23,250.00**

Hosting Services	Amount
Hosting (Level I)	$3,500.00
Annual Fees:	**$3,500.00**

Professional Services - Implementation	Amount
Electronic Requisitions Implementation	$1,500.00
Online Bill Pay (WIPP) - Implementation	$2,000.00
Parks & Recreation Facilities - Implementation	$1,250.00
Parks & Recreation Membership - Implementation	$1,250.00
Parks & Recreation Programs - Implementation	$1,250.00
Parks & Recreation Rentals - Implementation	$1,250.00

Professional Services - Implementation		Amount
Standard AR/Business Licensing Implementation		$2,000.00
Standard Finance Implementation		$7,500.00
	One-Time Fees:	**$18,000.00**

Conversion Services		Amount
Accounts Receivable – Base Conversion - *Customer demographic information* - *Active business license records for current year* - *Does not include any invoice history (open or closed)*		$2,750.00
	One-Time Fees:	**$2,750.00**

Software Services -Subscriptions

With an Edmunds GovTech solution, a true Windows application with a graphical user interface is delivered. All applications are ODBC compliant and utilize a SQL database, which allows for seamless integration with products such as MS Excel™, MS Word™, and many GIS packages to name a few.

Smart Phone Apps – All applicable Smart Phone Apps are included with the associated MCSJ module at no additional cost.

Security – The software features a single sign-on approach that allows for user-based security. This provides access to modules based on the employee's security profile. The security is module and task specific.

Integration – All modules are fully integrated. A single source of entry minimizes data entry errors and streamlines organizational processes. The system dynamically posts all related entries to the appropriate modules.

Reporting – Along with standard system reports, customized reporting is also provided. Through built-in custom reporting tools, users can create and save personalized reports that can be exported directly into MS Excel™. Reporting flexibility allows users to create unlimited custom reports that are accessible at any time.

PDF Forms - All required forms can be generated within the application. This reduces the need to have pre-printed forms, such as pre-printed checks or utility bills. Create customized letters by merging in any field from the system. Letters can be created, printed, and documented in the corresponding record.

Attachments - The ability to attach any type of file to records, accounts, and employees along with scanning images directly into the software is provided. There is no limitation with the amount or size of those items you wish to attach.

Edmunds Cloud Provides:

- Convenience and Resiliency
- Fast and secure access to information from anywhere, anytime
- Expansive data storage
- Redundant data backups to 3 locations in the US
- Maintains workflow during and after a crisis
- Always access the most current data available
- Empowers mobile and citizen engagement apps to work efficiently

Implementation & Project Management

Edmunds GovTech has a goal to make the transition from a legacy system as painless as possible. Project management includes planning, monitoring, and reporting of progress to ensure the success of the software implementation. The Client's Project Manager and EGT Staff will work in concert to identify the scope of the project, estimate the work involved, and create a project schedule with appropriate resources. The project plan is then developed to describe the tasks that will lead to a successful implementation. The project is carefully planned, implemented, monitored, and controlled. Problem resolution, risk management, opportunity management, change management, software configuration management, and data management are included, identified, and documented throughout the project. Project Managers and Training and Implementation Employees have been involved in hundreds of similar successful projects.

Independence City

_____	_____
Matthew Schmitz **City Manager**	**Date**

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	Matthew R. Schmitz, MPA - City Manager
FROM:	Fire Chief – Blake Hayward
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	2025 Haz Mat Fee Update

DISCUSSION:

Independence Fire has received updated Haz Mat Fee structure from the State. These fees are used for Haz Mat Clean ups and funds go back to the City General Fund as a reimbursement.

RECOMMENDATION:

Staff recommends approving the updated Haz Mat Fees.

Iowa Fire Service

Annual Hazardous Materials Response Fee Structure

Calendar Year 2024

Category	Examples	Hourly Cost*
Heavy Response Apparatus with 4 personnel	Engine, ladder, heavy rescue, etc.	$368.57
Light Response Apparatus with 2 personnel	Tanker, brush truck, ambulance, staff car, etc.	$293.74
Extra Response Personnel		$28.41
Expended Materials	Foam, containment booms, sand, absorbent, etc.	Replacement cost, including shipping.
Equipment Repair and/or Cleaning	Personal protective equipment, hose, nozzles; apparatus, etc.	Cost (parts plus labor), including shipping.
Damaged Equipment and/or Property	May include injury to, destruction of, or loss of natural resources, etc.	Replacement and/or repair cost, including shipping.
Other	Contracted services, contracted equipment, evacuation of people, etc.	Billed as used.

*Minimum of one hour. Billed in 15-minutes increments beyond the first hour.

This fee structure will be updated in January of each year according to the CPI-U, US City Average, All Items, 12-month percentage change for the period ending in October of the preceding year. (Reference: http://www.bls.gov/cpi/)

References:

- Hazardous Materials Response Billing Protocol for Iowa Fire Departments, Authored by Iowa Firemen's Association and the Iowa Hazardous Materials Taskforce, December 2002.
- Iowa Code 455B.392

Supporting Fire Service Organizations:

Iowa Firefighter's Association
Iowa Fire Chief's Association
Iowa Association of Professional Fire Chiefs
Iowa Hazardous Materials Task Force

Iowa Fire Service

Annual Hazardous Materials Response Fee Structure

Calendar Year 2025

Category	Examples	Hourly Cost*
Heavy Response Apparatus with 4 personnel	Engine, ladder, heavy rescue, etc.	$377.42
Light Response Apparatus with 2 personnel	Tanker, brush truck, ambulance, staff car, etc.	$300.79
Extra Response Personnel		$29.09
Expended Materials	Foam, containment booms, sand, absorbent, etc.	Replacement cost, including shipping.
Equipment Repair and/or Cleaning	Personal protective equipment, hose, nozzles; apparatus, etc.	Cost (parts plus labor), including shipping.
Damaged Equipment and/or Property	May include injury to, destruction of, or loss of natural resources, etc.	Replacement and/or repair cost, including shipping.
Other	Contracted services, contracted equipment, evacuation of people, etc.	Billed as used.

*Minimum of one hour. Billed in 15-minutes increments beyond the first hour.

This fee structure will be updated in January of each year according to the CPI-U, US City Average, All Items, 12-month percentage change for the period ending in October of the preceding year. (Reference: http://www.bls.gov/cpi/)

References:

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Supporting Fire Service Organizations:

Iowa Firefighter's Association
Iowa Fire Chief's Association
Iowa Association of Professional Fire Chiefs
Iowa Hazardous Materials Task Force

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	Matthew R. Schmitz, MPA - City Manager
FROM:	Blake Hayward, Fire Chief
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	ISO Report

DISCUSSION:

ISO review is done every 5 years and then the City is given a rating based on their findings. This rating is used when factoring insurance rates for the residents and commercial property owners in our fire district.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

1000 Bishops Gate Blv. Ste 300
Mt. Laurel, NJ 08054-5404

t1.800.444.4554 Opt.2
f1.800.777.3929

November 25, 2024

Ms. Brad Bleichner, Mayor
Independence FPSA
331 1st St E
Independence, Iowa, 50644

RE: Independence Fpsa, Buchanan County, Iowa
Public Protection Classification: 04/4Y
Effective Date: March 01, 2025

Dear Ms. Brad Bleichner,

We wish to thank you and Chief Blake Hayward for your cooperation during our recent Public Protection Classification (PPC) survey. ISO has completed its analysis of the structural fire suppression delivery system provided in your community. The resulting classification is indicated above.

If you would like to know more about your community's PPC classification, or if you would like to learn about the potential effect of proposed changes to your fire suppression delivery system, please call us at the phone number listed below.

ISO's Public Protection Classification Program (PPC) plays an important role in the underwriting process at insurance companies. In fact, most U.S. insurers – including the largest ones – use PPC information as part of their decision- making when deciding what business to write, coverage's to offer or prices to charge for personal or commercial property insurance.

Each insurance company independently determines the premiums it charges its policyholders. The way an insurer uses ISO's information on public fire protection may depend on several things – the company's fire-loss experience, ratemaking methodology, underwriting guidelines, and its marketing strategy.

Through ongoing research and loss experience analysis, we identified additional differentiation in fire loss experience within our PPC program, which resulted in the revised classifications. We based the differing fire loss experience on the fire suppression capabilities of each community. The new classifications will improve the predictive value for insurers while benefiting both commercial and residential property owners. We've published the new classifications as "X" and "Y" — formerly the "9" and "8B" portion of the split classification, respectively. For example:

- A community currently graded as a split 6/9 classification will now be a split 6/6X classification; with the "6X" denoting what was formerly classified as "9."
- Similarly, a community currently graded as a split 6/8B classification will now be a split 6/6Y classification, the "6Y" denoting what was formerly classified as "8B."

- Communities graded with single “9” or “8B” classifications will remain intact.
- Properties over 5 road miles from a recognized fire station would receive a class 10.

PPC is important to communities and fire departments as well. Communities whose PPC improves may get lower insurance prices. PPC also provides fire departments with a valuable benchmark, and is used by many departments as a valuable tool when planning, budgeting and justifying fire protection improvements.

ISO appreciates the high level of cooperation extended by local officials during the entire PPC survey process. The community protection baseline information gathered by ISO is an essential foundation upon which determination of the relative level of fire protection is made using the Fire Suppression Rating Schedule.

The classification is a direct result of the information gathered, and is dependent on the resource levels devoted to fire protection in existence at the time of survey. Material changes in those resources that occur after the survey is completed may affect the classification. Although ISO maintains a pro-active process to keep baseline information as current as possible, in the event of changes please call us at 1-800-444-4554, option 2 to expedite the update activity.

ISO is the leading supplier of data and analytics for the property/casualty insurance industry. Most insurers use PPC classifications for underwriting and calculating premiums for residential, commercial and industrial properties. The PPC program is not intended to analyze all aspects of a comprehensive structural fire suppression delivery system program. It is not for purposes of determining compliance with any state or local law, nor is it for making loss prevention or life safety recommendations.

If you have any questions about your classification, please let us know.

Sincerely,

Alex Shubert

Alex Shubert
Manager -National Processing Center

cc: Mr. Travis Foley, Water Superintendent, Independence Water Department
Mr. Mary Terry, Communications Supervisor, Buchanan County Sheriffs Department
Chief Blake Hayward, Chief, Independence Fire Department

INSURANCE SERVICES OFFICE, INC.

HYDRANT FLOW DATA SUMMARY

Community Independence Fpsa
County Iowa(Buchanan), State IOWA (14) Witnessed by: Insurance Services Office Survey Date: September 14, 2024

TEST NO.	TYPE DIST.*	TEST LOCATION	SERVICE	FLOW - GPM Q=(29.83(C(d^2)$p^{0.5}$)) INDIVIDUAL HYDRANTS			TOTAL	PRESSURE PSI STATIC	RESID.	FLOW -AT 20 PSI NEEDED **	AVAIL.	REMARKS***	MODEL TYPE	FLOW TEST DATE
1		5th Ave NE & 10th St NE	Independence Water Department, Main	580	0	0	580	60	55	5000	1800	(D)-(4884 gpm)	FTPC	09/18/2024
1.1		5th Ave NE & 10th St NE	Independence Water Department, Main	580	0	0	580	60	55	4000	1800		FTPC	09/18/2024
1.2		5th Ave NE & 10th St NE	Independence Water Department, Main	580	0	0	580	60	55	2500	1800		FTPC	09/18/2024
2		8th Ave NW & 3rd St NW	Independence Water Department, Main	1060	0	0	1060	70	65	6000	3700	(D)-(4884 gpm)	FTPC	09/18/2024
2.1		8th Ave NW & 3rd St NW	Independence Water Department, Main	1060	0	0	1060	70	65	3000	3700		FTPC	09/18/2024
3		Bland Ave & Liberty Trail	Independence Water Department, Main	1060	0	0	1060	70	65	7000	3700	(D)-(4884 gpm)	FTPC	09/14/2024
3.1		Bland Ave & Liberty Trail	Independence Water Department, Main	1060	0	0	1060	70	65	1500	3700		FTPC	09/14/2024
4		3rd Ave SE & 17th St SE	Independence Water Department, Main	1030	0	0	1030	70	65	5000	3600	(D)-(4884 gpm)	FTPC	09/14/2024
4.1		3rd Ave SE & 17th St SE	Independence Water Department, Main	1030	0	0	1030	70	65	4500	3600		FTPC	09/14/2024
4.2		3rd Ave SE & 17th St SE	Independence Water Department, Main	1030	0	0	1030	70	65	2500	3600		FTPC	09/14/2024
5		@ High School	Independence Water Department, Main	1060	0	0	1060	65	60	3500	3500		FTPC	09/14/2024
6		1st St & 13th St	Independence Water Department, Main	1060	0	0	1060	71	65	3500	3400		FTPC	09/14/2024
7		5th St SW & 6th Ave SW	Independence Water Department, Main	950	0	0	950	80	71	1500	2600		FTPC	09/14/2024
8		3rd Ave & 1st St E	Independence Water Department, Main	960	0	0	960	80	71	2500	2700		FTPC	09/14/2024
9		7th Ave SE & South of 5th St SE	Independence Water Department, Main	1190	0	0	1190	75	55	1500	2100		FTPC	09/14/2024
10		1201 12th St	Independence Water Department, Main	980	0	0	980	80	70	3500	2600		FTPC	09/14/2024

THE ABOVE LISTED NEEDED FIRE FLOWS ARE FOR PROPERTY INSURANCE PREMIUM CALCULATIONS ONLY AND ARE *NOT* INTENDED TO PREDICT THE MAXIMUM AMOUNT OF WATER REQUIRED FOR A LARGE SCALE FIRE CONDITION.

THE AVAILABLE FLOWS ONLY INDICATE THE CONDITIONS THAT EXISTED AT THE TIME AND AT THE LOCATION WHERE TESTS WERE WITNESSED.

***Comm = Commercial; Res = Residential.**

****Needed is the rate of flow for a specific duration for a full credit condition. Needed Fire Flows greater than 3,500 gpm are not considered in determining the classification of the city when using the Fire Suppression Rating Schedule.**

***** (A)-Limited by available hydrants to gpm shown. Available facilities limit flow to gpm shown plus consumption for the needed duration of (B)-2 hours, (C)-3 hours or (D)-4 hours.**

INSURANCE SERVICES OFFICE, INC.

HYDRANT FLOW DATA SUMMARY

Community Independence Fpsa
County Iowa(Buchanan), State IOWA (14) Witnessed by: Insurance Services Office Survey Date: September 14, 2024

TEST NO.	TYPE DIST.*	TEST LOCATION	SERVICE	FLOW - GPM				PRESSURE		FLOW -AT 20 PSI		REMARKS***	MODEL TYPE	FLOW TEST DATE
				INDIVIDUAL HYDRANTS			TOTAL	STATIC	RESID.	NEEDED **	AVAIL.			
11		1st St East of 15th Ave NE	Independence Water Department, Main	920	0	0	920	50	45	2250	2400		FTPC	09/14/2024
12		14th St NE & 6th Ave NE	Independence Water Department, Main	1010	0	0	1010	60	40	2000	1500		FTPC	09/14/2024
13		8th Ave NE & 5th St NE	Independence Water Department, Main	860	0	0	860	61	50	1500	1800		FTPC	09/14/2024
14		2nd Ave NE & 10th St NE	Independence Water Department, Main	650	0	0	650	69	64	2000	2200		FTPC	09/14/2024

THE ABOVE LISTED NEEDED FIRE FLOWS ARE FOR PROPERTY INSURANCE PREMIUM CALCULATIONS ONLY AND ARE *NOT* INTENDED TO PREDICT THE MAXIMUM AMOUNT OF WATER REQUIRED FOR A LARGE SCALE FIRE CONDITION.

THE AVAILABLE FLOWS ONLY INDICATE THE CONDITIONS THAT EXISTED AT THE TIME AND AT THE LOCATION WHERE TESTS WERE WITNESSED.

***Comm = Commercial; Res = Residential.**

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***** (A)-Limited by available hydrants to gpm shown. Available facilities limit flow to gpm shown plus consumption for the needed duration of (B)-2 hours, (C)-3 hours or (D)-4 hours.**

Public Protection Classification

(PPC®)

Summary Report

Independence FPSA

IOWA

Prepared by

Insurance Services Office, Inc.
1000 Bishops Gate Blvd., Ste. 300
P.O. Box 5404
Mt. Laurel, New Jersey 08054-5404
1-800-444-4554

Report Created November 2024

Effective March 1, 2025

Background Information

Introduction

ISO collects and evaluates information from communities in the United States on their structure fire suppression capabilities. The data is analyzed using our Fire Suppression Rating Schedule (FSRS) and then a Public Protection Classification (PPC©) grade is assigned to the community. The surveys are conducted whenever it appears that there is a possibility of a PPC change. As such, the PPC program provides important, up-to-date information about fire protection services throughout the country.

The FSRS recognizes fire protection features only as they relate to suppression of first alarm structure fires. In many communities, fire suppression may be only a small part of the fire department's overall responsibility. ISO recognizes the dynamic and comprehensive duties of a community's fire service, and understands the complex decisions a community must make in planning and delivering emergency services. However, in developing a community's PPC grade, only features related to reducing property losses from structural fires are evaluated. Multiple alarms, simultaneous incidents and life safety are not considered in this evaluation. The PPC program evaluates the fire protection for small to average size buildings. Specific properties with a Needed Fire Flow in excess of 3,500 gpm are evaluated separately and assigned an individual PPC grade.

A community's investment in fire mitigation is a proven and reliable predictor of future fire losses. Statistical data on insurance losses bears out the relationship between excellent fire protection – as measured by the PPC program – and low fire losses. So, insurance companies use PPC information for marketing, underwriting, and to help establish fair premiums for homeowners and commercial fire insurance. In general, the price of fire insurance in a community with a good PPC grade is substantially lower than in a community with a poor PPC grade, assuming all other factors are equal.

ISO is an independent company that serves insurance companies, communities, fire departments, insurance regulators, and others by providing information about risk. ISO's expert staff collects information about municipal fire suppression efforts in communities throughout the United States. In each of those communities, ISO analyzes the relevant data and assigns a PPC grade – a number from 1 to 10. Class 1 represents an exemplary fire suppression program, and Class 10 indicates that the area's fire suppression program does not meet ISO's minimum criteria.

ISO's PPC program evaluates communities according to a uniform set of criteria, incorporating nationally recognized standards developed by the National Fire Protection Association and the American Water Works Association. A community's PPC grade depends on:

- **Needed Fire Flows**, which are representative building locations used to determine the theoretical amount of water necessary for fire suppression purposes.
- **Emergency Communications**, including emergency reporting, telecommunicators, and dispatching systems.
- **Fire Department**, including equipment, staffing, training, geographic distribution of fire companies, operational considerations, and community risk reduction.
- **Water Supply**, including inspection and flow testing of hydrants, alternative water supply operations, and a careful evaluation of the amount of available water compared with the amount needed to suppress fires up to 3,500 gpm.

Data Collection and Analysis

ISO has evaluated and classified over 39,000 fire protection areas across the United States using its FSRS. A combination of meetings between trained ISO field representatives and the dispatch center coordinator, community fire official, and water superintendent is used in conjunction with a comprehensive questionnaire to collect the data necessary to determine the PPC grade. In order for a community to obtain a grade better than a Class 9, three elements of fire suppression features are reviewed. These three elements are Emergency Communications, Fire Department, and Water Supply.

A review of the **Emergency Communications** accounts for 10% of the total classification. This section is weighted at **10 points,** as follows:

- Emergency Reporting 3 points
- Telecommunicators 4 points
- Dispatch Circuits 3 points

A review of the **Fire Department** accounts for 50% of the total classification. ISO focuses on a fire department's first alarm response and initial attack to minimize potential loss. The fire department section is weighted at **50 points,** as follows:

- Engine Companies 6 points
- Reserve Pumpers 0.5 points
- Pump Capacity 3 points
- Ladder/Service Companies 4 points
- Reserve Ladder/Service Trucks 0.5 points
- Deployment Analysis 10 points
- Company Personnel 15 points
- Training 9 points
- Operational considerations 2 points
- Community Risk Reduction 5.5 points (in addition to the 50 points above)

A review of the **Water Supply** system accounts for 40% of the total classification. ISO reviews the water supply a community uses to determine the adequacy for fire suppression purposes. The water supply system is weighted at **40 points,** as follows:

- Credit for Supply System 30 points
- Hydrant Size, Type & Installation 3 points
- Inspection & Flow Testing of Hydrants 7 points

There is one additional factor considered in calculating the final score – **Divergence**.

Even the best fire department will be less than fully effective if it has an inadequate water supply. Similarly, even a superior water supply will be less than fully effective if the fire department lacks the equipment or personnel to use the water. The FSRS score is subject to modification by a divergence factor, which recognizes disparity between the effectiveness of the fire department and the water supply.

The Divergence factor mathematically reduces the score based upon the relative difference between the fire department and water supply scores. The factor is introduced in the final equation.

PPC Grade

The PPC grade assigned to the community will depend on the community's score on a 100-point scale:

PPC	Points
1	90.00 or more
2	80.00 to 89.99
3	70.00 to 79.99
4	60.00 to 69.99
5	50.00 to 59.99
6	40.00 to 49.99
7	30.00 to 39.99
8	20.00 to 29.99
9	10.00 to 19.99
10	0.00 to 9.99

The classification numbers are interpreted as follows:

- Class 1 through (and including) Class 8 represents a fire suppression system that includes an FSRS creditable dispatch center, fire department, and water supply.
- Class 8B is a special classification that recognizes a superior level of fire protection in otherwise Class 9 areas. It is designed to represent a fire protection delivery system that is superior except for a lack of a water supply system capable of the minimum FSRS fire flow criteria of 250 gpm for 2 hours.
- Class 9 is a fire suppression system that includes a creditable dispatch center, fire department but no FSRS creditable water supply.
- Class 10 does not meet minimum FSRS criteria for recognition, including areas that are beyond five road miles of a recognized fire station.

New PPC program changes effective July 1, 2014

We have revised the PPC program to capture the effects of enhanced fire protection capabilities that reduce fire loss and fire severity in Split Class 9 and Split Class 8B areas (as outlined below). This new structure benefits the fire service, community, and property owner.

New classifications
Through ongoing research and loss experience analysis, we identified additional differentiation in fire loss experience within our PPC program, which resulted in the revised classifications. We based the differing fire loss experience on the fire suppression capabilities of each community. The new PPC classes will improve the predictive value for insurers while benefiting both commercial and residential property owners. Here are the new classifications and what they mean.

Split classifications
When we develop a split classification for a community — for example 5/9 — the first number is the class that applies to properties within 5 road miles of the responding fire station and 1,000 feet of a creditable water supply, such as a fire hydrant, suction point, or dry hydrant. The second number is the class that applies to properties within 5 road miles of a fire station but beyond 1,000 feet of a creditable water supply. We have revised the classification to reflect more precisely the risk of loss in a community, replacing Class 9 and 8B in the second part of a split classification with revised designations.

What's changed with the new classifications?
We've published the new classifications as "X" and "Y" — formerly the "9" and "8B" portion of the split classification, respectively. For example:

- A community currently displayed as a split 6/9 classification will now be a split 6/6X classification; with the "6X" denoting what was formerly classified as "9".
- Similarly, a community currently graded as a split 6/8B classification will now be a split 6/6Y classification, the "6Y" denoting what was formerly classified as "8B".
- Communities graded with single "9" or "8B" classifications will remain intact.

Prior Classification	New Classification
1/9	1/1X
2/9	2/2X
3/9	3/3X
4/9	4/4X
5/9	5/5X
6/9	6/6X
7/9	7/7X
8/9	8/8X
9	9

Prior Classification	New Classification
1/8B	1/1Y
2/8B	2/2Y
3/8B	3/3Y
4/8B	4/4Y
5/8B	5/5Y
6/8B	6/6Y
7/8B	7/7Y
8/8B	8/8Y
8B	8B

What's changed?
As you can see, we're still maintaining split classes, but it's how we represent them to insurers that's changed. The new designations reflect a reduction in fire severity and loss and have the potential to reduce property insurance premiums.

Benefits of the revised split class designations

- To the fire service, the revised designations identify enhanced fire suppression capabilities used throughout the fire protection area
- To the community, the new classes reward a community's fire suppression efforts by showing a more reflective designation
- To the individual property owner, the revisions offer the potential for decreased property insurance premiums

New water class
Our data also shows that risks located more than 5 but less than 7 road miles from a responding fire station with a creditable water source within 1,000 feet had better loss experience than those farther than 5 road miles from a responding fire station with no creditable water source. We've introduced a new classification —10W — to recognize the reduced loss potential of such properties.

What's changed with Class 10W?
Class 10W is property-specific. Not all properties in the 5-to-7-mile area around the responding fire station will qualify. The difference between Class 10 and 10W is that the 10W-graded risk or property is within 1,000 feet of a creditable water supply. Creditable water supplies include fire protection systems using hauled water in any of the split classification areas.

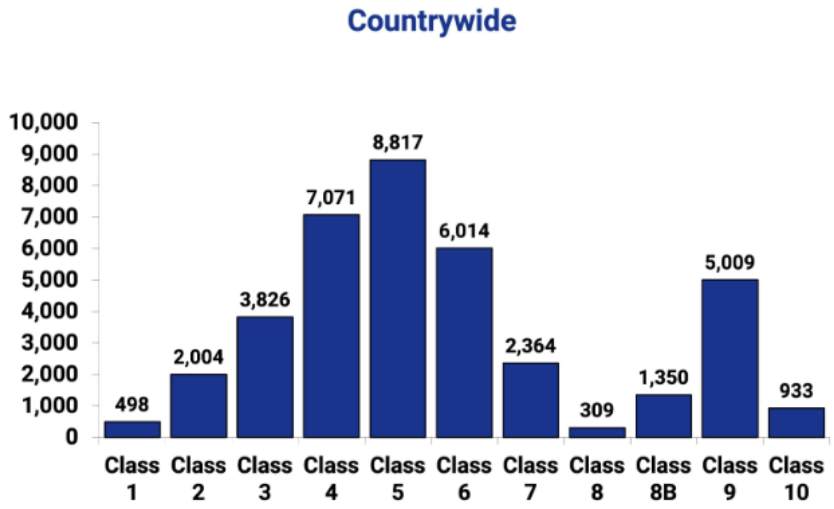
What's the benefit of Class 10W?
10W gives credit to risks within 5 to 7 road miles of the responding fire station and within 1,000 feet of a creditable water supply. That's reflective of the potential for reduced property insurance premiums.

What does the fire chief have to do?
Fire chiefs don't have to do anything at all. The revised classifications went in place automatically effective July 1, 2014 (July 1, 2015 for Texas).

What if I have additional questions?
Feel free to contact ISO at 800.444.4554 or email us at PPC-Cust-Serv@iso.com.

Distribution of PPC Grades

The 2023 published countrywide distribution of communities by the PPC grade is as follows:



Assistance

The PPC program offers help to communities, fire departments, and other public officials as they plan for, budget, and justify improvements. ISO is also available to assist in the understanding of the details of this evaluation.

The PPC program representatives can be reached by telephone at (800) 444-4554. The technical specialists at this telephone number have access to the details of this evaluation and can effectively speak with you about your questions regarding the PPC program. What's more, we can be reached via the internet at www.isomitigation.com/talk/.

We also have a website dedicated to our Community Hazard Mitigation Classification programs at www.isomitigation.com. Here, fire chiefs, building code officials, community leaders and other interested citizens can access a wealth of data describing the criteria used in evaluating how cities and towns are protecting residents from fire and other natural hazards. This website will allow you to learn more about the PPC program. The website provides important background information, insights about the PPC grading processes and technical documents. ISO is also pleased to offer Fire Chiefs Online — a special, secured website with information and features that can help improve your PPC grade, including a list of the Needed Fire Flows for all the commercial occupancies ISO has on file for your community. Visitors to the site can download information, see statistical results and also contact ISO for assistance.

In addition, on-line access to the FSRS and its commentaries is available to registered customers for a fee. However, fire chiefs and community chief administrative officials are given access privileges to this information without charge.

To become a registered fire chief or community chief administrative official, register at www.isomitigation.com.

PPC Review

ISO concluded its review of the fire suppression features being provided for Independence FPSA. The resulting community classification is **Class 04/4Y**.

If the classification is a single class, the classification applies to properties with a Needed Fire Flow of 3,500 gpm or less in the community. If the classification is a split class (e.g., 6/XX):

- The first class (e.g., "6" in a 6/XX) applies to properties within 5 road miles of a recognized fire station and within 1,000 feet of a fire hydrant or alternate water supply.
- The second class (XX or XY) applies to properties beyond 1,000 feet of a fire hydrant but within 5 road miles of a recognized fire station.
- Alternative Water Supply: The first class (e.g., "6" in a 6/10) applies to properties within 5 road miles of a recognized fire station with no hydrant distance requirement.
- Class 10 applies to properties over 5 road miles of a recognized fire station.
- Class 10W applies to properties within 5 to 7 road miles of a recognized fire station with a recognized water supply within 1,000 feet.
- Specific properties with a Needed Fire Flow in excess of 3,500 gpm are evaluated separately and assigned an individual classification.

FSRS Feature	Earned Credit	Credit Available
Emergency Communications		
414. Credit for Emergency Reporting	**1.95**	**3**
422. Credit for Telecommunicators	**2.40**	**4**
432. Credit for Dispatch Circuits	**2.91**	**3**
440. Credit for Emergency Communications	**7.26**	**10**
Fire Department		
513. Credit for Engine Companies	**5.04**	**6**
523. Credit for Reserve Pumpers	**0.00**	**0.50**
532. Credit for Pump Capacity	**3.00**	**3**
549. Credit for Ladder Service	**1.65**	**4**
553. Credit for Reserve Ladder and Service Trucks	**0.00**	**0.50**
561. Credit for Deployment Analysis	**7.67**	**10**
571. Credit for Company Personnel	**5.00**	**15**
581. Credit for Training	**1.44**	**9**
730. Credit for Operational Considerations	**2.00**	**2**
590. Credit for Fire Department	**25.80**	**50**
Water Supply		
616. Credit for Supply System	**28.02**	**30**
621. Credit for Hydrants	**2.70**	**3**
631. Credit for Inspection and Flow Testing	**3.20**	**7**
640. Credit for Water Supply	**33.92**	**40**
Divergence	**-6.64**	--
1050. Community Risk Reduction	**3.65**	**5.50**
Total Credit	**63.99**	**105.50**

Emergency Communications

Ten percent of a community's overall score is based on how well the communications center receives and dispatches fire alarms. Our field representative evaluated:

- Communications facilities provided for the general public to report structure fires
- Enhanced 9-1-1 Telephone Service including wireless
- Computer-aided dispatch (CAD) facilities
- Alarm receipt and processing at the communication center
- Training and certification of telecommunicators
- Facilities used to dispatch fire department companies to reported structure fires

	Earned Credit	Credit Available
414. Credit Emergency Reporting	**1.95**	3
422. Credit for Telecommunicators	**2.40**	4
432. Credit for Dispatch Circuits	**2.91**	3
Item 440. Credit for Emergency Communications:	**7.26**	**10**

Item 414 - Credit for Emergency Reporting (3 points)

The first item reviewed is Item 414 "Credit for Emergency Reporting (CER)". This item reviews the emergency communication center facilities provided for the public to report fires including 911 systems (Basic or Enhanced), Wireless Phase I and Phase II, Voice over Internet Protocol, Computer Aided Dispatch and Geographic Information Systems for automatic vehicle location. ISO uses National Fire Protection Association (NFPA) 1221, *Standard for the Installation, Maintenance and Use of Emergency Services Communications Systems* as the reference for this section.

Item 410. Emergency Reporting (CER)	Earned Credit	Credit Available
A./B. Basic 9-1-1, Enhanced 9-1-1 or No 9-1-1 For maximum credit, there should be an Enhanced 9-1-1 system, Basic 9-1-1 and No 9-1-1 will receive partial credit.	**20.00**	**20**
1. E9-1-1 Wireless Wireless Phase I using Static ALI (automatic location identification) Functionality (10 points); Wireless Phase II using Dynamic ALI Functionality (15 points); Both available will be 25 points	**25.00**	**25**
2. E9-1-1 Voice over Internet Protocol (VoIP) Static VoIP using Static ALI Functionality (10 points); Nomadic VoIP using Dynamic ALI Functionality (15 points); Both available will be 25 points	**10.00**	**25**
3. Computer Aided Dispatch Basic CAD (5 points); CAD with Management Information System (5 points); CAD with Interoperability (5 points)	**10.00**	**15**
4. Geographic Information System (GIS/AVL) The PSAP uses a fully integrated CAD/GIS management system with automatic vehicle location (AVL) integrated with a CAD system providing dispatch assignments. The individual fire departments being dispatched do not need GIS/AVL capability to obtain this credit.	**0.00**	**15**
Review of Emergency Reporting total:	**65.00**	**100**

Item 422- Credit for Telecommunicators (4 points)

The second item reviewed is Item 422 "Credit for Telecommunicators (TC)". This item reviews the number of Telecommunicators on duty at the center to handle fire calls and other emergencies. All emergency calls including those calls that do not require fire department action are reviewed to determine the proper staffing to answer emergency calls and dispatch the appropriate emergency response. The 2013 Edition of NFPA 1221, *Standard for the Installation, Maintenance and Use of Emergency Services Communications Systems,* recommends that ninety-five percent of emergency calls shall be answered within 15 seconds and ninety-nine percent of emergency calls shall be answered within 40 seconds. In addition, NFPA recommends that eighty percent of emergency alarm processing shall be completed within 60 seconds and ninety-five percent of alarm processing shall be completed within 106 seconds of answering the call.

To receive full credit for operators on duty, ISO must review documentation to show that the communication center meets NFPA 1221 call answering and dispatch time performance measurement standards. This documentation may be in the form of performance statistics or other performance measurements compiled by the 9-1-1 software or other software programs that are currently in use such as Computer Aided Dispatch (CAD) or Management Information System (MIS).

Item 420. Telecommunicators (CTC)	Earned Credit	Credit Available
A1. Alarm Receipt (AR) Receipt of alarms shall meet the requirements in accordance with the criteria of NFPA 1221	**20.00**	**20**
A2. Alarm Processing (AP) Processing of alarms shall meet the requirements in accordance with the criteria of NFPA 1221	**20.00**	**20**
B. Emergency Dispatch Protocols (EDP) Telecommunicators have emergency dispatch protocols (EDP) containing questions and a decision-support process to facilitate correct call categorization and prioritization.	**0.00**	**20**
C. Telecommunicator Training and Certification (TTC) Telecommunicators meet the qualification requirements referenced in NFPA 1061, *Standard for Professional Qualifications for Public Safety Telecommunicator,* and/or the Association of Public-Safety Communications Officials - International (APCO) *Project 33.* Telecommunicators are certified in the knowledge, skills, and abilities corresponding to their job functions.	**20.00**	**20**
D. Telecommunicator Continuing Education and Quality Assurance (TQA) Telecommunicators participate in continuing education and/or in-service training and quality-assurance programs as appropriate for their positions	**0.00**	**20**
Review of Telecommunicators total:	**60.00**	**100**

Item 432 - Credit for Dispatch Circuits (3 points)

The third item reviewed is Item 432 “Credit for Dispatch Circuits (CDC)”. This item reviews the dispatch circuit facilities used to transmit alarms to fire department members. A “Dispatch Circuit” is defined in NFPA 1221 as “A circuit over which an alarm is transmitted from the communications center to an emergency response facility (ERF) or emergency response units (ERUs) to notify ERUs to respond to an emergency”. All fire departments (except single fire station departments with full-time firefighter personnel receiving alarms directly at the fire station) need adequate means of notifying all firefighter personnel of the location of reported structure fires. The dispatch circuit facilities should be in accordance with the general criteria of NFPA 1221. “Alarms” are defined in this Standard as “A signal or message from a person or device indicating the existence of an emergency or other situation that requires action by an emergency response agency”.

There are two different levels of dispatch circuit facilities provided for in the Standard – a primary dispatch circuit and a secondary dispatch circuit. In jurisdictions that receive 730 alarms or more per year (average of two alarms per 24-hour period), two separate and dedicated dispatch circuits, a primary and a secondary, are needed. In jurisdictions receiving fewer than 730 alarms per year, a second dedicated dispatch circuit is not needed. Dispatch circuit facilities installed but not used or tested (in accordance with the NFPA Standard) receive no credit.

The score for Credit for Dispatch Circuits (CDC) is influenced by monitoring for integrity of the primary dispatch circuit. There are up to 0.90 points available for this Item. Monitoring for integrity involves installing automatic systems that will detect faults and failures and send visual and audible indications to appropriate communications center (or dispatch center) personnel. ISO uses NFPA 1221 to guide the evaluation of this item. ISO's evaluation also includes a review of the communication system's emergency power supplies.

Item 432 “Credit for Dispatch Circuits (CDC)” = 2.91 points

Fire Department

Fifty percent of a community's overall score is based upon the fire department's structure fire suppression system. ISO's field representative evaluated:

- Engine and ladder/service vehicles including reserve apparatus
- Equipment carried
- Response to reported structure fires
- Deployment analysis of companies
- Available and/or responding firefighters
- Training

	Earned Credit	Credit Available
513. Credit for Engine Companies	**5.04**	6
523. Credit for Reserve Pumpers	**0.00**	0.5
532. Credit for Pumper Capacity	**3.00**	3
549. Credit for Ladder Service	**1.65**	4
553. Credit for Reserve Ladder and Service Trucks	**0.00**	0.5
561. Credit for Deployment Analysis	**7.67**	10
571. Credit for Company Personnel	**5.00**	15
581. Credit for Training	**1.44**	9
730. Credit for Operational Considerations	**2.00**	2
Item 590. Credit for Fire Department:	**25.80**	**50**

Basic Fire Flow

The Basic Fire Flow for the community is determined by the review of the Needed Fire Flows for selected buildings in the community. The fifth largest Needed Fire Flow is determined to be the Basic Fire Flow. The Basic Fire Flow has been determined to be 3500 gpm.

Item 513 - Credit for Engine Companies (6 points)

The first item reviewed is Item 513 "Credit for Engine Companies (CEC)". This item reviews the number of engine companies, their pump capacity, hose testing, pump testing and the equipment carried on the in-service pumpers. To be recognized, pumper apparatus must meet the general criteria of NFPA 1901, *Standard for Automotive Fire Apparatus* which include a minimum 250 gpm pump, an emergency warning system, a 300 gallon water tank, and hose. At least 1 apparatus must have a permanently mounted pump rated at 750 gpm or more at 150 psi.

The review of the number of needed pumpers considers the response distance to built-upon areas; the Basic Fire Flow; and the method of operation. Multiple alarms, simultaneous incidents, and life safety are not considered.

The greatest value of A, B, or C below is needed in the fire district to suppress fires in structures with a Needed Fire Flow of 3,500 gpm or less: **3 engine companies**

a) **1 engine companies** to provide fire suppression services to areas to meet NFPA 1710 criteria or within 1½ miles.

b) **3 engine companies** to support a Basic Fire Flow of 3500 gpm.

c) **3 engine companies** based upon the fire department's method of operation to provide a minimum two engine response to all first alarm structure fires.

The FSRS recognizes that there are **3 engine companies** in service.

The FSRS also reviews Automatic Aid. Automatic Aid is considered in the review as assistance dispatched automatically by contractual agreement between two communities or fire districts. That differs from mutual aid or assistance arranged case by case. ISO will recognize an Automatic Aid plan under the following conditions:

- It must be prearranged for first alarm response according to a definite plan. It is preferable to have a written agreement, but ISO may recognize demonstrated performance.
- The aid must be dispatched to all reported structure fires on the initial alarm.
- The aid must be provided 24 hours a day, 365 days a year.

FSRS Item 512.D "Automatic Aid Engine Companies" responding on first alarm and meeting the needs of the city for basic fire flow and/or distribution of companies are factored based upon the value of the Automatic Aid plan (up to 1.00 can be used as the factor). The Automatic Aid factor is determined by a review of the Automatic Aid provider's communication facilities, how they receive alarms from the graded area, inter-department training between fire departments, and the fire ground communications capability between departments.

For each engine company, the credited Pump Capacity (PC), the Hose Carried (HC), the Equipment Carried (EC) all contribute to the calculation for the percent of credit the FSRS provides to that engine company.

Item 513 "Credit for Engine Companies (CEC)" = 5.04 points

Item 523 - Credit for Reserve Pumpers (0.50 points)

The item is Item 523 “Credit for Reserve Pumpers (CRP)”. This item reviews the number and adequacy of the pumpers and their equipment. The number of needed reserve pumpers is 1 for each 8 needed engine companies determined in Item 513, or any fraction thereof.

Item 523 “Credit for Reserve Pumpers (CRP)” = 0.00 points

Item 532 – Credit for Pumper Capacity (3 points)

The next item reviewed is Item 532 “Credit for Pumper Capacity (CPC)”. The total pump capacity available should be sufficient for the Basic Fire Flow of 3500 gpm. The maximum needed pump capacity credited is the Basic Fire Flow of the community.

Item 532 “Credit for Pumper Capacity (CPC)” = 3.00 points

Item 549 – Credit for Ladder Service (4 points)

The next item reviewed is Item 549 “Credit for Ladder Service (CLS)”. This item reviews the number of response areas within the city with 5 buildings that are 3 or more stories or 35 feet or more in height, or with 5 buildings that have a Needed Fire Flow greater than 3,500 gpm, or any combination of these criteria. The height of all buildings in the city, including those protected by automatic sprinklers, is considered when determining the number of needed ladder companies. Response areas not needing a ladder company should have a service company. Ladders, tools and equipment normally carried on ladder trucks are needed not only for ladder operations but also for forcible entry, ventilation, salvage, overhaul, lighting and utility control.

The number of ladder or service companies, the height of the aerial ladder, aerial ladder testing and the equipment carried on the in-service ladder trucks and service trucks is compared with the number of needed ladder trucks and service trucks and an FSRS equipment list. Ladder trucks must meet the general criteria of NFPA 1901, *Standard for Automotive Fire Apparatus* to be recognized.

The number of needed ladder-service trucks is dependent upon the number of buildings 3 stories or 35 feet or more in height, buildings with a Needed Fire Flow greater than 3,500 gpm, and the method of operation.

The FSRS recognizes that there are **1 ladder companies** in service. These companies are needed to provide fire suppression services to areas to meet NFPA 1710 criteria or within 2½ miles and the number of buildings with a Needed Fire Flow over 3,500 gpm or 3 stories or more in height, or the method of operation.

The FSRS recognizes that there are **0 service companies** in service.

Item 549 “Credit for Ladder Service (CLS)” = 1.65 points

Item 553 – Credit for Reserve Ladder and Service Trucks (0.50 points)

The next item reviewed is Item 553 “Credit for Reserve Ladder and Service Trucks (CRLS)”. This item considers the adequacy of ladder and service apparatus when one (or more in larger communities) of these apparatus are out of service. The number of needed reserve ladder and service trucks is 1 for each 8 needed ladder and service companies that were determined to be needed in Item 540, or any fraction thereof.

Item 553 “Credit for Reserve Ladder and Service Trucks (CRLS)” = 0.00 points

Item 561 – Deployment Analysis (10 points)

Next, Item 561 “Deployment Analysis (DA)” is reviewed. This Item examines the number and adequacy of existing engine and ladder-service companies to cover built-upon areas of the city.

To determine the Credit for Distribution, first the Existing Engine Company (EC) points and the Existing Engine Companies (EE) determined in Item 513 are considered along with Ladder Company Equipment (LCE) points, Service Company Equipment (SCE) points, Engine-Ladder Company Equipment (ELCE) points, and Engine-Service Company Equipment (ESCE) points determined in Item 549.

Secondly, as an alternative to determining the number of needed engine and ladder/service companies through the road-mile analysis, a fire protection area may use the results of a systematic performance evaluation. This type of evaluation analyzes computer-aided dispatch (CAD) history to demonstrate that, with its current deployment of companies, the fire department meets the time constraints for initial arriving engine and initial full alarm assignment in accordance with the general criteria of in NFPA 1710, *Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments.*

A determination is made of the percentage of built upon area within 1½ miles of a first-due engine company and within 2½ miles of a first-due ladder-service company.

Item 561 “Credit Deployment Analysis (DA)” = 7.67 points

Item 571 – Credit for Company Personnel (15 points)

Item 571 "Credit for Company Personnel (CCP)" reviews the average number of existing firefighters and company officers available to respond to reported first alarm structure fires in the city.

The on-duty strength is determined by the yearly average of total firefighters and company officers on-duty considering vacations, sick leave, holidays, "Kelley" days and other absences. When a fire department operates under a minimum staffing policy, this may be used in lieu of determining the yearly average of on-duty company personnel.

Firefighters on apparatus not credited under Items 513 and 549 that regularly respond to reported first alarms to aid engine, ladder, and service companies are included in this item as increasing the total company strength.

Firefighters staffing ambulances or other units serving the general public are credited if they participate in fire-fighting operations, the number depending upon the extent to which they are available and are used for response to first alarms of fire.

On-Call members are credited on the basis of the average number staffing apparatus on first alarms. Off-shift career firefighters and company officers responding on first alarms are considered on the same basis as on-call personnel. For personnel not normally at the fire station, the number of responding firefighters and company officers is divided by 3 to reflect the time needed to assemble at the fire scene and the reduced ability to act as a team due to the various arrival times at the fire location when compared to the personnel on-duty at the fire station during the receipt of an alarm.

The number of Public Safety Officers who are positioned in emergency vehicles within the jurisdiction boundaries may be credited based on availability to respond to first alarm structure fires. In recognition of this increased response capability the number of responding Public Safety Officers is divided by 2.

The average number of firefighters and company officers responding with those companies credited as Automatic Aid under Items 513 and 549 are considered for either on-duty or on-call company personnel as is appropriate. The actual number is calculated as the average number of company personnel responding multiplied by the value of AA Plan determined in Item 512.D.

The maximum creditable response of on-duty and on-call firefighters is 12, including company officers, for each existing engine and ladder company and 6 for each existing service company.

Chief Officers are not creditable except when more than one chief officer responds to alarms; then extra chief officers may be credited as firefighters if they perform company duties.

The FSRS recognizes **2.09 on-duty personnel** and an average of **17.75 on-call personnel** responding on first alarm structure fires.

Item 571 "Credit for Company Personnel (CCP)" = 5.00 points

Item 581 – Credit for Training (9 points)

Training	Earned Credit	Credit Available
A. Facilities, and Use For maximum credit, each firefighter should receive 18 hours per year in structure fire related subjects as outlined in NFPA 1001.	**0.00**	**35**
B. Company Training For maximum credit, each firefighter should receive 16 hours per month in structure fire related subjects as outlined in NFPA 1001.	**3.58**	**25**
C. Classes for Officers For maximum credit, each officer should be certified in accordance with the general criteria of NFPA 1021. Additionally, each officer should receive 12 hours of continuing education on or off site.	**0.00**	**12**
D. New Driver and Operator Training For maximum credit, each new driver and operator should receive 60 hours of driver/operator training per year in accordance with NFPA 1002 and NFPA 1451.	**1.00**	**5**
E. Existing Driver and Operator Training For maximum credit, each existing driver and operator should receive 12 hours of driver/operator training per year in accordance with NFPA 1002 and NFPA 1451.	**3.57**	**5**
F. Training on Hazardous Materials For maximum credit, each firefighter should receive 6 hours of training for incidents involving hazardous materials in accordance with NFPA 472.	**0.50**	**1**
G. Recruit Training For maximum credit, each firefighter should receive 240 hours of structure fire related training in accordance with NFPA 1001 within the first year of employment or tenure.	**5.00**	**5**
H. Pre-Fire Planning Inspections For maximum credit, pre-fire planning inspections of each commercial, industrial, institutional, and other similar type building (all buildings except 1-4 family dwellings) should be made annually by company members. Records of inspections should include up-to date notes and sketches.	**2.40**	**12**

Item 580 "Credit for Training (CT)" = 1.44 points

Item 730 – Operational Considerations (2 points)

Item 730 "Credit for Operational Considerations (COC)" evaluates fire department standard operating procedures and incident management systems for emergency operations involving structure fires.

Operational Considerations	Earned Credit	Credit Available
Standard Operating Procedures The department should have established SOPs for fire department general emergency operations	**50**	**50**
Incident Management Systems The department should use an established incident management system (IMS)	**50**	**50**
Operational Considerations total:	**100**	**100**

Item 730 "Credit for Operational Considerations (COC)" = 2.00 points

Water Supply

Forty percent of a community's overall score is based on the adequacy of the water supply system. The ISO field representative evaluated:

- the capability of the water distribution system to meet the Needed Fire Flows at selected locations up to 3,500 gpm.
- size, type and installation of fire hydrants.
- inspection and flow testing of fire hydrants.

	Earned Credit	Credit Available
616. Credit for Supply System	**28.02**	30
621. Credit for Hydrants	**2.70**	3
631. Credit for Inspection and Flow Testing	**3.20**	7
Item 640. Credit for Water Supply:	**33.92**	**40**

Item 616 – Credit for Supply System (30 points)

The first item reviewed is Item 616 "Credit for Supply System (CSS)". This item reviews the rate of flow that can be credited at each of the Needed Fire Flow test locations considering the supply works capacity, the main capacity and the hydrant distribution. The lowest flow rate of these items is credited for each representative location. A water system capable of delivering 250 gpm or more for a period of two hours plus consumption at the maximum daily rate at the fire location is considered minimum in the ISO review.

Where there are 2 or more systems or services distributing water at the same location, credit is given on the basis of the joint protection provided by all systems and services available.

The supply works capacity is calculated for each representative Needed Fire Flow test location, considering a variety of water supply sources. These include public water supplies, emergency supplies (usually accessed from neighboring water systems), suction supplies (usually evidenced by dry hydrant installations near a river, lake or other body of water), and supplies developed by a fire department using large diameter hose or vehicles to shuttle water from a source of supply to a fire site. The result is expressed in gallons per minute (gpm).

The normal ability of the distribution system to deliver Needed Fire Flows at the selected building locations is reviewed. The results of a flow test at a representative test location will indicate the ability of the water mains (or fire department in the case of fire department supplies) to carry water to that location.

The hydrant distribution is reviewed within 1,000 feet of representative test locations measured as hose can be laid by apparatus.

For maximum credit, the Needed Fire Flows should be available at each location in the district. Needed Fire Flows of 2,500 gpm or less should be available for 2 hours; and Needed Fire Flows of 3,000 and 3,500 gpm should be obtainable for 3 hours.

Item 616 "Credit for Supply System (CSS)" = 28.02 points

Item 621 – Credit for Hydrants (3 points)

The second item reviewed is Item 621 "Credit for Hydrants (CH)". This item reviews the number of fire hydrants of each type compared with the total number of hydrants.

There are a total of 365 hydrants in the graded area.

620. Hydrants, - Size, Type and Installation	Number of Hydrants
A. With a 6 -inch or larger branch and a pumper outlet with or without 2½ -inch outlets	317
B. With a 6 -inch or larger branch and no pumper outlet but two or more 2½ -inch outlets, or with a small foot valve, or with a small barrel	0
C./D. With only a 2½ -inch outlet or with less than a 6 -inch branch	48
E./F. Flush Type, Cistern, or Suction Point	0

Item 621 "Credit for Hydrants (CH)" = 2.70 points

Item 630 – Credit for Inspection and Flow Testing (7 points)

The third item reviewed is Item 630 "Credit for Inspection and Flow Testing (CIT)". This item reviews the fire hydrant inspection frequency, and the completeness of the inspections. Inspection of hydrants should be in accordance with AWWA M-17, *Installation, Field Testing and Maintenance of Fire Hydrants.*

Frequency of Inspection (FI): Average interval between the 3 most recent inspections.

Frequency	Points
1 year	30
2 years	20
3 years	10
4 years	5
5 years or more	No Credit

Note: The points for inspection frequency are reduced by 10 points if the inspections are incomplete or do not include a flushing program. An additional reduction of 10 points are made if hydrants are not subjected to full system pressure during inspections. If the inspection of cisterns or suction points does not include actual drafting with a pumper, or back-flushing for dry hydrants, 20 points are deducted.

Total points for Inspections = 3.20 points

Frequency of Fire Flow Testing (FF): Average interval between the 3 most recent inspections.

Frequency	Points
5 years	40
6 years	30
7 years	20
8 years	10
9 years	5
10 years or more	No Credit

Total points for Fire Flow Testing = 0.00 points

Item 631 "Credit for Inspection and Fire Flow Testing (CIT)" = 3.20 points

Divergence = -6.64

The Divergence factor mathematically reduces the score based upon the relative difference between the fire department and water supply scores. The factor is introduced in the final equation.

Community Risk Reduction

	Earned Credit	Credit Available
1025. Credit for Fire Prevention and Code Enforcement (CPCE)	**1.44**	2.2
1033. Credit for Public Fire Safety Education (CFSE)	**1.38**	2.2
1044. Credit for Fire Investigation Programs (CIP)	**0.83**	1.1
Item 1050. Credit for Community Risk Reduction	**3.65**	**5.50**

Item 1025 – Credit for Fire Prevention Code Adoption and Enforcement (2.2 points)	Earned Credit	Credit Available
Fire Prevention Code Regulations (PCR) Evaluation of fire prevention code regulations in effect.	**8.60**	**10**
Fire Prevention Staffing (PS) Evaluation of staffing for fire prevention activities.	**1.28**	**8**
Fire Prevention Certification and Training (PCT) Evaluation of the certification and training of fire prevention code enforcement personnel.	**1.63**	**6**
Fire Prevention Programs (PCP) Evaluation of fire prevention programs.	**14.60**	**16**
Review of Fire Prevention Code and Enforcement (CPCE) subtotal:	**26.11**	**40**

Item 1033 – Credit for Public Fire Safety Education (2.2 points)	Earned Credit	Credit Available
Public Fire Safety Educators Qualifications and Training (FSQT) Evaluation of public fire safety education personnel training and qualification as specified by the authority having jurisdiction.	**3.33**	**10**
Public Fire Safety Education Programs (FSP) Evaluation of programs for public fire safety education.	**21.75**	**30**
Review of Public Safety Education Programs (CFSE) subtotal:	**25.08**	**40**

Item 1044 – Credit for Fire Investigation Programs (1.1 points)	Earned Credit	Credit Available
Fire Investigation Organization and Staffing (IOS) Evaluation of organization and staffing for fire investigations.	**8.00**	**8**
Fire Investigator Certification and Training (IQT) Evaluation of fire investigator certification and training.	**1.18**	**6**
Use of National Fire Incident Reporting System (IRS) Evaluation of the use of the National Fire Incident Reporting System (NFIRS) for the 3 years before the evaluation.	**6.00**	**6**
Review of Fire Investigation Programs (CIP) subtotal:	**15.18**	**20**

Summary of PPC Review
for
Independence FPSA

FSRS Item	Earned Credit	Credit Available
Emergency Communications		
414. Credit for Emergency Reporting	**1.95**	**3**
422. Credit for Telecommunicators	**2.40**	**4**
432. Credit for Dispatch Circuits	**2.91**	**3**
440. Credit for Emergency Communications	**7.26**	**10**
Fire Department		
513. Credit for Engine Companies	**5.04**	**6**
523. Credit for Reserve Pumpers	**0.00**	**0.5**
532. Credit for Pumper Capacity	**3.00**	**3**
549. Credit for Ladder Service	**1.65**	**4**
553. Credit for Reserve Ladder and Service Trucks	**0.00**	**0.5**
561. Credit for Deployment Analysis	**7.67**	**10**
571. Credit for Company Personnel	**5.00**	**15**
581. Credit for Training	**1.44**	**9**
730. Credit for Operational Considerations	**2.00**	**2**
590. Credit for Fire Department	**25.80**	**50**
Water Supply		
616. Credit for Supply System	**28.02**	**30**
621. Credit for Hydrants	**2.70**	**3**
631. Credit for Inspection and Flow Testing	**3.20**	**7**
640. Credit for Water Supply	**33.92**	**40**
Divergence	**-6.64**	--
1050. Community Risk Reduction	**3.65**	**5.50**
Total Credit	**63.99**	**105.5**

Final Community Classification = 04/4Y

CITY COUNCIL
WORK SESSION
MEMORANDUM

TO:	City Council
FROM:	Matthew R. Schmitz, MPA - City Manager
DATE OF MEETING:	December 2, 2024
ITEM TITLE:	Tenant Transition from Business to GCC – Office 365

DISCUSSION:

As Staff had been discussing new requirements for two-factor authorization within the Police Department (a new mandate from the FBI) it was noted that our current email system (Office 365), which is cloud hosted, is hosted on the General Business side of Microsoft. To be compliant with Criminal Justice Information Systems (CJIS) regulations for the Police Department, we should be hosted within the Government Computing Cloud (GCC) side of Microsoft. To complete this transition, an outside vendor would be needed, and I contacted Dell to discuss that process. They connected me with Team Venti, who is a partner of theirs that does this type of work. A proposal is attached for the work for discussion by the Council. This would include the migration of all email accounts to the GCC system, as well as the other parts of Office 365 such as Teams.

As part of this transition, we will be moving from the independenceia.org domain to the independenceia.gov domain which is not yet a requirement, but is strongly suggested by the Federal Government for local governmental entities. We will still maintain the .org domain and will be able to receive email using those addresses when this work is complete.

During Budget Amendment #1, I asked ACM/CCT Lampe to move $12,000 from legal services to the IT line item to support this project. The current proposal is for $10,509 and is attached for review.

RECOMMENDATION:

Staff recommends discussion of this topic. No action is needed at this meeting, as any decision items needed would be brought forward to a City Council meeting for approval.

Commercial Tenant to GCC Tenant Migration

Proper planning is key to every successful Microsoft 365 migration. In this proposed engagement, Dell/Team Venti will assist the City of Independence IA with the planning and migration of their current Microsoft commercial tenant to a GCC Tenant on Microsoft 365.

Our packaged migration services deliver a turnkey project with guaranteed outcomes for the successful migration of all employee data without business interruption and without loss of data.

Scope of Migration:

- **Exchange Online:** Migration of up to 64 user mailboxes (under 50 GB each), 3 shared mailboxes, 11 distribution groups, 3 resources/rooms, and 4 contacts to the new GCC Tenant. *No public folders are included in the scope.*
- **Microsoft Teams**: Migration of 69 users and 3 Teams, without public or private channels.
- **SharePoint Online:** Limited use of SharePoint will be addressed by migrating existing Teams Sites linked to group data, ensuring data continuity.

Throughout the GCC transition, Microsoft's best practices will be implemented to strengthen security and operational efficiency, even if governance or compliance policies are not yet defined.

Timeframe: Approximately 3 to 4 weeks to complete.

Project Activities

Phase	Tasks
Project Kick-off	• Kick-off call • Create project plan

Exchange Migration	• Configure data migration tool permissions on source and target tenants
	• Create Microsoft 365 accounts in target tenant
	• Creation of Distribution Groups on target tenant
	• Content transfer and monitoring
	• Cut Over/Go Live Support
	  ○ DNS records for updating in the registrar
	  ○ Remove domain from source users
	  ○ Remove domain from source tenant
	  ○ Add domain to target tenant
	  ○ Assign users correct email addresses and usernames
	• Migration of any remaining items from Source

Teams Migration	• Teams' assessment in source organization
	• Initiate migration:
	  ○ Teams, Public, Organizational
	  ○ Archived teams - moved as public teams and must be re-archived at destination
	  ○ Channels - All channels are migrated
	  ○ Conversations, Root messages, Replies
	  ○ Structure, Format, Fonts, Bullets, Lists, Colors, Quotes, Emojis, GIFs
	  ○ Online images and stickers
	  ○ Code snippets, Hyperlinks
	  ○ Deleted message notifications
	  ○ Mentions (as plain text to prevent duplicate notification after migration)
	  ○ Timestamps (in UTC)
	  ○ Files in Channels: All files in Channels are migrated
	  ○ Files in Private Chats will be migrated as part of the OneDrive for Business migration
	  ○ All memberships to be migrated

Teams Private Chat	• Configure source and target permissions for Teams Chat migration • Perform eDiscovery to run a search on all user chats, exporting them as HTML files and sharing with the customer • Migrate User chats • Cleanup Chats Note: Chat history will no longer be limited to 30 days as this new approach bypasses that limitation
DMARC/DKIM/SPF Configuration	• Configure DMARC • Configure DKIM • Configure SPF • Email flow service validation
Project Closeout	• Wrap up call • 7 days of post migration support (warranty on our services)

Estimated Project Effort

Based on similar efforts, we have estimated a fixed price of $10,509.00 for this project, which includes the necessary licenses.

Note: This is a budgetary quote. Dell will confirm and share the final quote, and a detailed outline of pricing and activities will be provided in the official Statement of Work.