



August 18, 2016

MEMORANDUM

TO: Bill Brecks, City of Lexington

FROM: J.B. Dixon, FHU

SUBJECT: 2016 MS4 Stormwater Program Tasks and Recommendations Summary
FHU Reference No. 10-090-05

Felsburg, Holt & Ullevig (FHU) has been tasked with helping facilitate the 2016 implementation and tracking for Stormwater Management Plan (SWMP) compliance tasks for the City of Lexington. This memorandum summarizes our recommendations.

SWMP Task List Development

The purpose of this deliverable is to convert the current SWMP into a list of activities and tasks that can be implemented for the remainder of 2016. This is a work-in-progress and may be updated year to year with modifications when the SWMP is updated. FHU utilized current Lexington SWMP and the 2013/2014 MS4 Program Evaluation to populate a MS4 activities task list for the City to manage for the remainder of 2016. Each MS4 activity is listed in an Excel spreadsheet by Minimum Control Measure and BMP with a description and recommended implementation date or range, for quickly assessing which activities should be in progress at any given time. The format can be used year to year with modifications when the SWMP is updated.

To provide a user-friendly, value-added tool, the individual BMPs and their recommended date ranges within each Minimum Control Measure has been laid out on a separate spreadsheet for at-a-glance support to make decision-making and prioritization easier from week to week. This format can be utilized each subsequent year, or modified to establish work priorities quarterly.

Recommendations for Lexington MS4 Program Component Creation and Implementation

In reviewing the Stormwater Management Plan and the 2014/2015 MS4 Evaluation conducted by FHU, the following MS4 Program components are highly recommended for initiation and/or completion within calendar year 2016.

1. Facility Runoff Control Plan Implementation & Training
City staff should provide Municipal Maintenance Facility staff with inspection and education assistance associated with the Streets Maintenance Facility. This task includes:

- ❖ Review and implement the Facility Runoff Control Plan (FRCP) the city Services Center.
- ❖ Conduct one (1) general session educations for the facility employees;
- ❖ Conduct one (1) training session to educate select facility employees how to conduct periodic inspections using the inspection forms and FRCP document.
- ❖ Begin monthly inspections by facility staff immediately after inspection training.

2. Municipal Facility Inventory & Hot Spot Evaluation

The City of Lexington should conduct a windshield survey of existing municipal facilities that could require good housekeeping and pollution prevention practices to comply with the MS4 Permit. These facilities may include any municipal facility within the City limits where operation and maintenance of vehicles and equipment, substantial waste management, or management of significant amounts of materials, stockpiles, or bulk storage tanks is conducted. Staff will discuss future good housekeeping and pollution prevention efforts that should be considered at these facilities to comply with the MS4 Permit and provide a brief summary and facility photo log.

3. Dry Weather Screening of Select Stormwater Outfalls into the MS4

One of the Best Management Practices for MCM 3: Illicit Discharge Detection & Elimination is to conduct dry-weather screening for known major outfalls (30" diameter and larger) into the MS4 (SWMP: MCM 3, BMP 3). The following procedures are recommended for completion of this task:

- ❖ Desktop review of candidate outfall locations and coordination of field equipment.
 - Review available stormwater infrastructure GIS layers and a list of priority focus areas to investigate outfalls.
 - Locations should be reviewed for site accessibility and basic screening of land area discharging to each outfall location.
 - The City of Lexington may need to obtain property access for some outfall locations.
- ❖ Utilize data forms and a GPS-enabled camera for use in the field.
- ❖ Dry weather field screening equipment, data collection sheets, gear, and sample containers should be prepared to take into the field.
- ❖ Field visit to outfall locations to map each outfall location and record outfall condition.
 - At each outfall, utilize an Outfall Data Sheet to collect relevant information about the outfall location. A GPS data point and at least one photograph will be collected for each outfall if needed.
 - If flow is occurring at the time of the dry weather inspection, a sample should be collected for analysis according to part 3 of this scope.
- ❖ Sample collection at outfalls where flows are present
 - Screening parameters have been selected to provide the greatest indication of the types of urban pollutants that may be washing off the landscape into receiving waters.
 - Additional investigation, follow-up enforcement, and additional water quality protection efforts associated with identified dry-weather flows may be needed.
- ❖ Post-processing of data.
 - Conduct a verification of all data collected and post-process all geographic information into a format that can be integrated with existing Lexington GIS data. All

photographs, datasheets, sample results, and shapefiles should be compiled and saved in easily referenced digital and print files.

- Save an Outfall Inventory Library and geodatabase for record retention and future outfall screening on an established three-year schedule.

4. Creation of an Illicit Discharge Detection and Elimination (IDDE) Plan

City staff supports MS4 requirements to implement and enforce a program, including a schedule, to detect and remove illicit discharges and improper disposal into the MS4. The City of Lexington should consider production of the following:

- ❖ Produce an Illicit Discharge Detection and Elimination program document for the City to adopt and apply. The Lexington MS4 Program Evaluation conducted by FHU in 2014/2015 identified that the City does not have a written IDDE plan. Many of the required elements of an IDDE Plan have been completed. MS4 Staff should compile all required elements as a draft IDDE Plan including, but not limited to:
 - Definitions
 - contacts and assigned responsibilities
 - outfall characterization
 - outfall screening (dry weather)
 - source investigation
 - discharge elimination procedures
 - ordinance references
 - Enforcement
 - reporting and record keeping
 - public education and staff training
 - maps and forms.
- ❖ After feedback is provided, adopt and include as supporting documentation for your SWMP.

If you have any questions, please do not hesitate to contact me at 402-438-7530, or at jb.dixon@fhueng.com