

Stormwater Management Plan

MCM 1: Public Education and Outreach

The goal of the Public Education and Outreach MCM is to distribute messages that will result in practices by the target audience that prevent stormwater pollution.

Under the City of Lexington's first permit term a great deal of focus was put towards the Public Education and Outreach programs. Overall the educational strategy was general education distributed high traffic areas where the public had the greatest chance of seeing the ads. These included TV, Billboard, Newspaper, and mailers. Also created during this period was the Nebraska H2O website that focuses directly on public education. Pages were added to the City of Lexington website directed towards stormwater management and education.

The City of Lexington program searched many methods of education and created partnerships between multiple groups to accomplish our educational goals. In joining together with all Phase II communities in Nebraska, NDOR, UNL Extension, LTAP and others we were able to spread more stormwater education to all program areas than could be done on our own.

The past five years have shown a positive increase in general stormwater program knowledge throughout the local public and construction community. The City of Lexington education program will continue many of the mass media educational efforts into the next permit term. However, one of our goals for the next five years will be to apply a direct focus to target areas in the community. Some of these target audiences may include but are not limited to the following: Auto Shops, Landscaping services, Construction Contractors, Restaurants and pet owners. Hitting these higher pollutant risk situations with process specific education it is our hope the education will have a greater effect on the way they operate on a daily basis. Reducing even greater the chance of pollutant discharge to the environment.

The City of Lexington may conduct other activities not specifically identified in this section which contribute to MCM 1: Public Education and Outreach.

MCM 1: Public Education and Outreach

BMP 1: Stormwater Education Materials

Permit Requirement Citation: Part IV, Sections D.1.a.1 & 3, D.3.d.2.e, and D.3.f.1.b-d,

Activity: The MS4 will follow a Public Education and Outreach (PEO) Strategy to distribute targeted messages for education to the Public using Printed Materials, Public Service Announcements (PSAs), the City’s Stormwater Management Webpage, and Social Media Outlets to communicate the importance and methods of protecting stormwater.

Objective: To increase the Public’s awareness of stormwater pollution and best practices to protect water quality.

Evaluation Measures/Measurable Goals:

Performance:

1. Develop and maintain PEO Strategy
2. For each printed material, track the
 - a. Number of materials distributed
 - b. Frequency of distribution
 - c. Estimated number of recipients
 - d. Cost to the MS4
3. For each PSA, track the
 - a. Distribution method: email, radio, TV, and/or social media
 - b. Estimated number of viewers
 - c. Cost to the MS4
4. Include local MS4 program and general stormwater information links on the City’s website.

Effectiveness:

1. Target educational information to targeted audiences (Document method in PEO)
2. Update educational information based upon information gained from public feedback (MCM 2 BMP 2).

Implementation Schedule:	Permit Year				
	1	2	3	4	5
Develop a PEO Strategy and submit with Annual Report	✓				
Maintain a current and accurate PEO Strategy (Part IV, Section D.1.a.3)		✓	✓	✓	✓
Coordinate resources needed to develop stormwater quality information	✓	✓	✓	✓	✓
Distribute, track, and report stormwater quality information made available to the public	✓	✓	✓	✓	✓

BMP Target Audience: City Employees, K-12 School Children, Developers, Builders, Trade Contractors, Residents, Business Owners, Civic Groups

BMP Target Message: Pick up Pet Waste, Eliminate Over-fertilization, Report Illegal Discharges, Eliminate Cross-connections, Maintain Septic Systems, Proper Management of Household Hazardous Waste, Follow Required Construction Practices, Minimize Water Quality Impacts from Development, Nothing but Stormwater Goes Down the Drain, Beneficial Uses of Water

MCM 1: Public Education and Outreach

BMP 2: Stormwater Training

Permit Requirement Citation: Part IV, Sections D.1.a.1 & 3, D.2.c, D.3.d.2, D.3.e, D.3.f.1.a, D.5.e

Activity: The MS4 will follow a Public Education and Outreach Strategy to promote and/or provide stormwater training opportunities to the Public using Conferences, Workshop, Training Sessions, Webinars and/or other Educational Events that teach the importance and methods of protecting stormwater.

Objective: To improve the Public’s knowledge and skills needed to prevent stormwater pollution and protect water quality by using Best Management Practices.

Evaluation Measures/Measurable Goals:

Performance:

1. For each training opportunity, track the:
 - a. Topic/agenda/trainer
 - b. Number invited/methods used
 - c. Number attended
 - d. Cost to MS4

Effectiveness:

1. Target training topics to target audiences for each MCM
2. Target training methods to target audiences for each MCM
3. Use survey information (Evaluation and Assessment Plan) to improve training topics and methods

	Permit Year				
Implementation Schedule:	1	2	3	4	5
Develop a PEO Strategy and submit with Annual Report	✓				
Maintain a current and accurate PEO Strategy (Part IV, Section D.1.a.3)		✓	✓	✓	✓
Coordinate resources needed to develop stormwater training opportunities	✓	✓	✓	✓	✓
Promote, sponsor, (co)host, track, and report stormwater training opportunities provided to the public	✓	✓	✓	✓	✓

BMP Target Audience: City Employees, Developers, Builders, Trade Contractors

BMP Target Topics: Reporting Illegal Discharges and Illicit Connections, Stormwater Controls for Construction Activity, Land Development Practices that Minimize Water Resource Impacts, Municipal Facility Good Housekeeping Best Management Practices, Outfall Field Screening

Stormwater Management Plan

MCM 2: Public Involvement/Participation

The goal of the Public Involvement/Participation MCM is to engage the public into the process of developing, improving, and providing stormwater management Best Management Practices.

The past five years have created many opportunities for public involvement and participation. In the beginning we looked for events that would be meaningful to the community, yet get our word about the program to a large audience. Throughout the permit term many events were tried to help determine the most effective for distribution and target audience. Some of the events included the following: Nebraska Outdoors Expo, Inlet Marking Events and hands on classroom presentations at area elementary/middle schools. During this time many new partnerships were formed between the City of Lexington and program sponsors.

By our previous participation in multiple community events it has become a goal to determine what type of events and which target audience would be most beneficial to these efforts. Currently the City of Lexington feels that all youth events have been extremely beneficial in spreading the pollution prevention message. We plan to continue our participation and sponsorship efforts with programs like the Nebraska Outdoors Expo, classroom presentations, many public service groups and inlet marking events. In addition the City of Lexington will continue when necessary to seek out public comment on new rule and program development as it has done in the past.

In focusing on these types of events we feel that we can bring more to the youth of Lexington by continuing to provide pollution prevention to them. This however does not indicate that the focus of other groups will be ceased. We will continue to reach these groups in need of educational information by other means.

The City of Lexington may conduct other activities not specifically identified in this section which contribute to MCM 2: Public Involvement/Participation.

MCM 2: Public Involvement/Participation

BMP 1: Public Review and Comment

Permit Requirement Citation: Part IV, Section D.1.a.2.a

Activity: The MS4 will provide the Public with publicly announced or formally requested opportunities to review and comment on new rules, regulations and SWMP changes intended to protect stormwater quality within the City.

Objectives: To engage the Public in the process to review all new stormwater –related rules, regulations, and SWMP changes that may affect residents, businesses, development, and municipal government and will document considerations and changes made to the rules and regulations as a result of the Public’s comments.

Evaluation Measures/Measurable Goals:

Performance:

1. For each required or requested review, track the:
 - a. Public notice provided and number of invitations sent
 - b. Groups or individuals requesting review
 - c. Number of individuals that participate
 - d. Review type such as Steering or Technical Committee, Commission or Council Meeting, Special Interest Group
 - e. Materials distributed
 - f. Public comments submitted
 - g. Cost to the MS4

Effectiveness:

1. Outreach to engage the Public demonstrates a comprehensive approach with sufficient notice given, but is also targeted to audiences specifically impacted or interested.
2. Document how public comments were taken into consideration in revisions, or provided sufficient justification for why consideration was not implemented.

Implementation Schedule:	Permit Year				
	1	2	3	4	5
Develop a PEO Strategy and submit with Annual Report	✓				
Maintain a current and accurate PEO Strategy (Part IV, Section D.1.a.3)		✓	✓	✓	✓
Coordinate resources needed to facilitate review and comment by the Public (a minimum of one Council or Commission meeting will be facilitated annually to discuss changes to stormwater rules and the SWMP)	✓	✓	✓	✓	✓
Promote, facilitate, track, and report public review opportunities	✓	✓	✓	✓	✓

BMP Target Audience: Elected Officials, Residents, Businesses, Developers, Builders, Trade Contractors, City Employees

BMP Target Topics: Major SWMP Updates, Policy or Guidance Changes and Additions, Municipal Code Revisions, State and Federal Regulations

MCM 2: Public Involvement/Participation

BMP 2: Public Input Resources

Permit Requirement Citation: Part IV, Sections D.1.a.2, D.2.b.1, D.3.f.2

Activity: The MS4 will maintain resources that allow the public to readily provide feedback about educational information and rules and to submit details about problems impacting stormwater quality, stream habitat, and receiving water quality.

Objectives: To equip the Public with tools to inform the City about stormwater protection ideas and concerns so the City can take appropriate actions to protect water resources and municipal assets.

Evaluation Measures/Measurable Goals:

Performance:

1. Host telephone hotline
2. Host feedback tool on website
3. Host social media network
4. Provide comment cards at public meetings, training events, and municipal buildings
5. For each comment submitted, track the:
 - a. Comment provided by the Public
 - b. Method comment was received
 - c. Action taken by the MS4.
6. Track the cost to the MS4

Effectiveness:

1. The MS4 cannot require public feedback, but it can ensure that opportunities for providing information are readily available for the public to use.
2. Information submitted by the public is used to promptly address any stormwater problems and to make improvements to the stormwater management efforts by the MS4.

	Permit Year				
Implementation Schedule:	1	2	3	4	5
Develop a PEO Strategy and submit with Annual Report	✓				
Maintain a current and accurate PEO Strategy (Part IV, Section D.1.a.3)		✓	✓	✓	✓
Coordinate resources needed to host public input resources		✓	✓	✓	✓
Promote, facilitate, track, and report public input provided to the MS4		✓	✓	✓	✓

BMP Target Audience: Residents, Civic Groups, Municipal Employees, Developers, Builders, Trade Contractors

MCM 2: Public Involvement/Participation

BMP 3: Community Environmental Events

Permit Requirement Citation: Part IV, Sections D.1.a.2.b, D.5.d.1.b

Activity: The MS4 will promote and participate in area outreach events such as Inlet Marking, Stream Clean-up, Household Hazardous Waste Collection, Recycling, and outdoors related public events that encourage the public to reduce the risk of stormwater pollution.

Objective: To increase the organization, leadership, funding, and participation for Environmental Events which promote stormwater quality and water resources protection.

Evaluation Measures/Measurable Goals:

Performance:

1. Promote and participate in area outreach events that encourage the Public to reduce the risk of stormwater pollution.
2. For each event, track the
 - a. Target audience
 - b. Purpose of event
 - c. Number of individuals and/or groups organizing/coordinating
 - d. Number of individuals attending
 - e. Cost to the MS4
 - f. Total Cost of the Event

Effectiveness:

1. Locations of events are selected based on the potential to have the highest impact on stormwater quality, impaired streams, and known TMDLs.
2. Annual participation in events increases during the permit term.
3. Opportunities to participate are provided in multiple locations and methods to encourage participation.
4. Feedback from the Public is used to adjust how outreach efforts are provided to improve the stormwater program.

	Permit Year				
Implementation Schedule:	1	2	3	4	5
Develop a PEO Strategy and submit with Annual Report	✓				
Maintain a current and accurate PEO Strategy (Part IV, Section D.1.a.3)		✓	✓	✓	✓
Coordinate resources needed to facilitate environmental events (at a minimum the MS4 will continue to promote the inlet marking program and one other Environmental Event within the community or region annually)	✓	✓	✓	✓	✓
Promote, facilitate, track, and report participation in Environmental Events	✓	✓	✓	✓	✓

BMP Target Audience: Residents, Businesses, Civic Groups, Municipal Employees, Natural Resources District

Stormwater Management Plan

MCM 3: Illicit Discharge Detection and Elimination

The goal of the Illicit Discharge Detection and Elimination MCM is to facilitate the timely identification and removal of prohibited stormwater connections and discharges.

The illicit discharge detection and elimination program has continually evolved over the past five years. The City of Lexington was fortunate enough to not be starting from scratch. Many existing city codes and programs have addressed unauthorized dumping issues in the past. This did not directly address stormwater, but rather broadly general pollution control. These codes may not have been directly focused on stormwater discharge issues but they do relate to the big picture of reducing pollutant discharge into the environment. These codes were used to create new ordinances and an IDDE program that directly addresses stormwater quality and pollutant removal.

A large goal for this program was to develop a fast track way to report issues citizens may see throughout our community so they may be properly addressed by city staff. The City of Lexington in the past has developed codes intended to address issues that include pollution prevention. Illicit discharge detection and elimination has fallen without issue in line with the process we have developed in the past. An addition to the existing program, a call in system using 911, was developed with cooperation from the Dawson County Sheriff's dispatch center to dedicated cellular phone within the Building and Inspection Department. The availability to handle illicit discharges is now 24 hours a day. This updated call in system coupled with the system in place to handle code issues allows the City to identify and remove illicit discharged in a timely manner.

The future of this program will continue to change as needed; much like it has over the past five years. Current program elements will continue to be implemented, while other will be updated. However, the main goal of familiarizing our citizen's on how they can report instances of illicit discharge.

The City of Lexington may conduct other activities not specifically identified in this section which contribute to MCM 3: Illicit Discharge Detection and Elimination.

MCM 3: Illicit Discharge Detection and Elimination

BMP 1: Dry Weather Inspections

Permit Requirement Citation: Part IV Section D.2.a.1.b

Activity: The MS4 will conduct a dry-weather field screening program for major stormwater outfalls that meet the minimum size requirements as defined in 40 CFR 122.26(b)(5).

Objective: To maximize the use of available resources to look for evidence of illicit discharges that can be investigated, traced, and removed to protect water quality.

Evaluation Measures/Measurable Goals:

Performance:

1. Conduct Physical Characteristics Examination or field screening annually based on the following criteria:
 - a. Inside pipe diameter of 36” or greater;
 - b. Other collected overland drainage of 50 acres or more;
 - c. Within Industrial Zoning: Inside pipe diameter of 12” or greater;
 - d. Within Industrial Zoning: Other collected overland drainage of 2 acres or more;
 - e. Other priority outfalls as defined by the MS4;
 - f. Complete 20% of defined outfalls annually.
2. For each field screening activity, track the
 - a. Results of field screening efforts in a central database;
 - b. Cost of screening efforts

Effectiveness:

1. Inspection procedures include a scan for pollutants causing known stream impairments or in a TMDL.
2. Inspections are prioritized for outfalls discharging to impaired streams.
3. Inspections are prioritized for drainage areas with previous complaints.
4. Information in the investigation records is used to evaluate future priority areas and update list of hotspots.

Implementation Schedule:	Permit Year				
	1	2	3	4	5
Adopt dry weather field screening procedures that include basis for determining priority areas and inspection criteria for field, analytical monitoring procedures, resources required, resources available, and field screening protocols.	✓ Update	✓ Final			
Follow dry weather field screening procedures	✓	✓	✓	✓	✓
Record inspection dates, results, and observations in a database.	✓	✓	✓	✓	✓

BMP Targets: Older portions of MS4 with aging infrastructure, industrial areas, portions of MS4 with septic systems, hotspots where dumping, spills, or other illicit discharges are a common occurrence.

MCM 3: Illicit Discharge Detection and Elimination

BMP 2: Discharge Investigation and Removal

Permit Requirement Citation: Part IV, Sections C, D.2.a.1.c & d, D.2.b.2 & 3

Activities: The MS4 will develop and follow procedures to identify, investigate, and enforce the removal and/or clean up of illicit connections and illegal discharges.

Objective: Investigate all prohibited illegal discharges and illicit connections so action can be taken to remove and/or clean up as many as possible.

Evaluation Measures/Measurable Goals:

Performance:

1. Maintain ordinances that prohibit illegal discharges and illicit connections.
2. Adopt and maintain an Enforcement Response Plan for illegal discharges and illicit connections
3. Maintain written protocol (i.e procedures, staff, and equipment) for investigating illegal discharges and illicit connections.
4. Investigate reports and monitoring results that indicate a possible illegal discharge or illicit connection
5. Apply Enforcement Response Plan to confirmed illegal discharges and illicit connections
6. For each illegal discharge or illicit connection, track/document the:
 - a. Steps taken to investigate and resolve it;
 - b. Result of enforcement action;
 - c. Cost of enforcement and/or clean-up effort

Effectiveness:

1. Monitor the success rate for removing illicit connections and illegal discharges (Benchmark 100%).
2. Investigations explore locations of infiltration from sanitary sewer system and discharges from underground septic systems to eliminate sources of E.coli
3. Circumstances for illicit connections are reviewed with staff to determine how the municipal planning, review, and/or enforcement processes can be modified to prevent similar occurrences.
4. The PEO Strategy includes training for staff responding and conducting investigations for illegal discharges and illicit connections.

Implementation Schedule:	Permit Year				
	1	2	3	4	5
Develop a Enforcement Response Plan and written protocol for IDDE investigations and submit it with Annual Report	✓ Update	✓ Final			
Maintain current and accurate ordinances, ERP, and written investigation protocol			✓	✓	✓
Follow investigation and enforcement procedures and record investigation dates, personnel involved, equipment, findings, enforcement steps, and date investigation was closed in a database.	✓	✓	✓	✓	✓

BMP Targets: Consistent Responses, Efficient Resolution, Adequate Documentation, Protect Municipal Assets, Illegal Dumping

MCM 3: Illicit Discharge Detection and Elimination

BMP 3: Storm Sewer System Mapping

Permit Requirement Citation: Part IV.D.2.a.1.a

Activity: The MS4 will maintain a current map of the storm sewer drainage system.

Objective: To facilitate the prioritization of dry-weather inspection locations, investigation of sources of pollution identified and reported, protection of downstream receiving waters, and education of the public.

Evaluation Measures/Measurable Goals:

Performance:

1. Require geographic reference for all new outfall locations that meet the criteria of MCM 3 BMP 1 as well as all stormwater inlets when new development applications are submitted for review.
2. Field verify all inlet locations and each new outfall location during the final project inspection.
3. Field verify and complete the mapping of existing stormwater drainage system assets.

Effectiveness:

1. The effectiveness of storm drain system mapping is related to the ability to effectively complete MCM 3 BMP 1 & 2.
2. The stormwater drainage system map is used to prioritize areas for stream restoration and protection projects.
3. The stormwater drainage system map is used to prioritize areas for dry-weather monitoring.

Implementation Schedule:	Permit Year				
	1	2	3	4	5
Coordinate resources needed to complete mapping of all existing storm drainage system assets and their drainage areas.	✓	✓	✓	✓	✓
Develop and implement protocol to require all new development and redevelopment plans to include geographic reference for all inlets and any outfall locations on the property.	✓ Update	✓ Final	✓	✓	✓

BMP Targets: GIS, Emergency Response Planning, New Development and Redevelopment Plans, Dry Weather Monitoring, Receiving Water Quality, Visual Public Education

Stormwater Management Plan

MCM: 4 Construction Site Stormwater Runoff Control

The Goal of the Construction Site Stormwater Runoff Control MCM is to require and oversee practices that minimize the discharge of pollutants from construction sites.

City staff has considered much of the first permit term a time for continued education. The need to change the mindset about stormwater and pollution prevention of key stakeholders in the construction industry has taken and will continue to take a great deal of effort. Although we feel we have made a great deal of progress we must continue to push for improvements in the field of construction. This being said, educational efforts will continue with a clear target audience and message. Site compliance will also have an increased focus. We have made great progress in these areas and will continue to make erosion and sediment control issues a priority for individuals in the construction industry.

The City of Lexington may conduct other activities not specifically identified in this section which contribute to MCM 4: Construction Site Stormwater Runoff Control.

MCM 4: Construction Site Stormwater Runoff Control

BMP 1: Construction Stormwater Management Plans

Permit Requirement Citation: Part IV.D.3.a - c

Activity: The MS4 will review and approve construction stormwater management plans for projects that meet the criteria established by regulations and minimum standards in local ordinances and design guidelines.

Objective: To require compliance with minimum construction standards and provide compliance assistance in advance of land disturbance for enforcement of local ordinances.

Evaluation Measures/Measurable Goals:

Performance:

1. Maintain locally approved standards for construction stormwater BMPs.
2. Adopt and follow checklist of minimum review considerations such as NDEQ NPDES general permit coverage, project phasing, erosion and sediment controls, soil stabilization, dewatering, pollution prevention measures, prohibited discharges and surface outlets.
3. Applications that are not complete or do not meet minimum erosion and sediment control plan standards are returned with comments or denied.
4. Maintain a current list of approved construction sites with status dates for under review, authorized, active construction, completed
5. All construction activity (per minimum regulations) requires approval before disturbing soil.

Effectiveness:

1. Erosion and sediment control plans require consideration of pollutants that are causing known local stream impairments or are included in a TMDL.
2. The PEO Strategy includes education and training for applicants designing, submitting, and following Construction Stormwater Management Plans.
3. The PEO Strategy includes education and training for applicants reviewing Construction Stormwater Management Plans and locally approved BMPs.

	Permit Year				
Implementation Schedule:	1	2	3	4	5
Adopt checklist of minimum considerations for Construction Stormwater Management Plans	✓				
Develop and adopt locally approved standards for construction stormwater BMPs		✓	✓	✓	✓
Follow checklist of minimum considerations for Construction Stormwater Management Plans	✓	✓	✓	✓	✓
Maintain current list of approved construction sites	✓	✓	✓	✓	✓

BMP Targets: Submittal Procedures, Review Process Consistency, Site Plans, Standard BMP Information, Enforceability, Compliance Assistance, Documentation

MCM 4: Construction Site Stormwater Runoff Controls

BMP 2: Construction Stormwater Inspections

Permit Requirement Citation: Part IV, Section D.3.d.1-4

Activity: The MS4 will maintain a process of municipal site inspections and applicant self-inspections for types of construction activity that meet criteria established in local regulations.

Objective: To conduct consistent site inspections that generate defensible and actionable documentation about site conditions and compliance.

Evaluation Measures/Measurable Goals:

Performance:

1. For MS4 inspections, follow checklist of minimum requirements that considers:
 - a. if erosion and sediment control plan is current and accurate;
 - b. if field conditions are in compliance or what corrective actions are required for findings;
 - c. compliance with self-inspection requirements;
 - d. compliance with local ordinances and/or permits;
 - e. observations of potential discharges of pollutants;
 - f. provides a report document.
2. Record the number of inspections conducted by the MS4.

3. Provide self-inspection recording instrument for project inspectors.

Effectiveness:

1. Prioritize active construction site inspections for permitted projects that:
 - a. discharge to waters impaired by a pollutant of concern;
 - b. have a TMDL; or
 - c. have demonstrated significant violations with local regulations, inspection requirements, or erosion and sediment control standards.
2. The PEO Strategy includes education and training for inspectors completing inspections by the City and the Applicant's Representative.

Implementation Schedule:	Permit Year				
	1	2	3	4	5
Adopt inspection procedures, priority criteria and recording instruments.	✓				
Coordinate resources required to conduct routine and complaint response inspections by the MS4 for public and private projects.	✓	✓	✓	✓	✓
Follow inspection priorities and procedures and document inspection dates, observations, and corrective actions in a database.	✓	✓	✓	✓	✓
Estimate the frequency and/or number of inspections planned for the following year and resources required to submit with Annual Report. The initial benchmark of inspecting each site one time per development season will be set. Additional inspection may be required if complaints are received.	✓	✓	✓	✓	✓

BMP Targets: Documentation, Compliance Assistance, Education and Training

MCM 4: Construction Site Stormwater Runoff Control

BMP 3: Construction Stormwater Enforcement

Permit Requirement Citation: Part IV, Sections C, D.3.d.4

Activity: The MS4 will take enforcement action against construction activities that are in violation of local regulations and minimum standards.

Objective: To protect water quality by issuing timely and consistent enforcement actions and causing the quick resolution of non-compliance at construction sites so construction projects are not allowed to gain unfair advantage by ignoring local regulations and minimum standards.

Evaluation Measures/Measurable Goals:

Performance:

1. Maintain ordinances that prohibit construction stormwater non-compliance
2. Update and maintain an Enforcement Response Plan (ERP) for construction stormwater non-compliance
3. Document and track actions taken such as verbal notice, letter of warning, consent order, stop work order, citations, and fines for each non-compliant construction site

Effectiveness:

1. The PEO Strategy includes education and training for inspectors about how to follow the Enforcement Response Plan and how to consider the unique circumstances of a violation.
2. Monitor the success rate for bringing construction violations into compliance.

Implementation Schedule:	Permit Year				
	1	2	3	4	5
Update the ERP and the enforcement mechanisms listed within it such as template letters, financial instruments, citations, and law enforcement protocol		✓ Draft	✓ Final		
Maintain current and accurate ordinances, ERP, and enforcement mechanisms	✓	✓	✓	✓	✓
Follow ERP and document enforcement communication dates, parties involved, actions taken, and resolution dates in a database.	✓	✓	✓	✓	✓

BMP Targets: Enforceability, Compliance Assistance, Documentation, Equality, Predictability

Stormwater Management Plan

MCM 5: Post Construction Stormwater Management Program

The Goal of the Post Construction Stormwater Management Program MCM is to require permanent measures that protect stormwater quality from new development and redevelopment projects.

Areas of the post construction program are being planned at this time. During our first permit term measures were taken to approve the groundwork ordinance for the post construction programs. This was done and approved by the Lexington City Council. The passing of this ordinance will allow us a starting point to develop the post construction programs around during the next permit term.

The City of Lexington may conduct other activities not specifically identified in this section which contribute to MCM 5: Post construction Stormwater management in new development and redevelopment.

MCM 5: Post Construction Stormwater Management Program

BMP 1: Post Construction Stormwater Management Plans

Permit Requirement Citation: Part IV, Section D.4.a-e

Activity: The MS4 will apply regionally relevant Post Construction Stormwater Management guidance and require stormwater BMPs for all new development and redevelopment.

Objective: To guide and enforce local development practices that protect naturally occurring hydrology, reduce urban pollution, preserve, restore and conserve natural landscapes, prevent erosion, and control sedimentation.

Evaluation Measures/Measurable Goals:

Performance:

1. Adopt and follow written procedures to implement a Post Construction Program to include:
 - a. ordinances and locally approved standards for Post Construction stormwater BMPs that address design, installation, water quality benefits, performance, inspection frequency, maintenance and cost;
 - b. submittal requirements for minimum review considerations of site discharge volume, rate, duration, and frequency, BMP location, as-build drawings, maintenance responsibility, and BMP certifications;
2. Return with comment or deny deficient submittals that do not meet minimum Post Construction Program standards.
3. Maintain database of Post-Construction BMP construction status locations, owners, maintenance requirements

Effectiveness:

1. Receiving waters do not demonstrate increased impairment, reduced water quality, or inhibited habitat integrity as a result of urban stormwater runoff or associated pollutants.
2. On a project basis, development sites must demonstrate consideration of pollutants that are causing or may cause known local stream impairments or are included in a TMDL.
3. On a watershed basis, urban stormwater contributions of pollutants discharging to impaired streams or included in a TMDL are reduced using nonstructural and structural BMPs.
4. The PEO Strategy includes information needed for BMP owners to understand the function and benefits of BMPs

Implementation Schedule:	Permit Year				
	1	2	3	4	5
Adopt written procedures for implementing the Post Construction Program	✓ Draft	✓ Draft	✓ Final		
Maintain approved local ordinances and standards for Post Construction stormwater BMPs		✓	✓	✓	✓
Coordinate resources required for reviewing Post Construction Management Plans of all new development and redevelopment projects		✓	✓	✓	✓
Maintain current list and information about Post Construction BMPs		✓	✓	✓	✓

BMP Targets: Submittal Procedures and Content, Review Process Consistency, Enforceability, Compliance Assistance, Documentation, Grandfathering Prior Approval, Easements

MCM 5: Post Construction Stormwater Management Program

BMP 2: Post Construction BMP Inspections and Maintenance

Permit Requirement Citation: Part IV, Sections D.4.d & f, D (also refers to D.5.a & d.4 which are accomplished through MCM 6 BMP 2)

Activity: The MS4 will require all structural water quality BMPs (both public and private) to be inspected and maintained according to their needs as defined in the local Post Construction stormwater management guidance.

Objective: To periodically review and document the structural condition of water quality BMPs designed to protect receiving waters from urban stormwater runoff and to take action to return BMPs to designed conditions when inspections demonstrate action is warranted.

Evaluation Measures/Measurable Goals:

Performance:

1. Develop and adopt Post Construction Stormwater BMP inspection and notice of required maintenance instruments.
2. Field verify all Post Construction Stormwater BMP conditions prior to providing certification.
3. Conduct on-going inspections of structural BMPs according to frequency and procedures adopted for MCM 5 BMP 1.
4. Require maintenance of private structural BMPs.
5. For each BMP, provide a report document that tracks the
 - a. Inspection dates
 - b. Inspection findings
 - c. Documentation of communications made
 - d. Documentation of corrective actions taken

Effectiveness:

1. Design problems, functional deficiencies, and construction-related errors are identified and help inform the Post Construction Stormwater Management Plan review process in MCM 5 BMP 1.
2. Easements and Maintenance Agreements for Post Construction BMPs allow the MS4 to require and, if necessary, take maintenance actions that restore the integrity of BMPs to design conditions and protect receiving water quality.
3. The PEO Strategy includes information needed for BMP owners to understand how to inspect and resources for maintaining BMPs.

	Permit Year				
Implementation Schedule:	1	2	3	4	5
Adopt inspection procedures and required maintenance notice instruments.			✓		
Coordinate resources required to conduct routine and complaint response inspections by the MS4 for public and private BMPs.			✓	✓	✓
Follow inspection priorities and procedures and document inspection dates, observations, communications, and corrective actions in a database.			✓	✓	✓
Estimate the frequency and/or number of inspections planned for the following year and resources required to submit with Annual Report.			✓	✓	✓

BMP Targets: Unknown Future Maintenance Needs, Documentation, Education and Training

Stormwater Management Plan

MCM 6: Good Housekeeping / Pollution Prevention

The Goal of the Good Housekeeping/Pollution Prevention Program is to engage public employees and public properties in the best practices of stormwater protection.

Although many departments and operations throughout the City of Lexington already employed environmentally responsible practices, some areas were not addressed. The evaluations of all City facilities were mainly to verify that all industrial NPDES permits were being operated properly and to evaluate the operations of other departments that were not required to obtain NPDES industrial permits. Our initial evaluations showed that all facilities required to carry industrial permits were currently operating these permits. The remaining facilities were evaluated for possibly hazardous operations and general facility pollutant potential.

Training of City employees focus has shifted over the permit term from getting employees knowledgeable about the programs to providing them with a clearer understanding of their responsibility to report needed events and reduce pollutant potential from their own operations. In addition, summer employees are informed of the program and general pollutant reduction goals.

A program review was started during the last year of the permit term. The review's purpose is to better address issues that are more specific to Lexington operation and to create a better employee facility inspection program. To date hotspot evaluations have been conducted on all facilities and determinations have been made on which facilities will require an active Runoff Control program. The City is currently working on updating these plans for each hotspot facility and will continue these programs into the next permit term. Training for all field employees will be continued on an annual basis with a goal of quarterly training news letters at a minimum.

The City of Lexington may conduct other activities not specifically identified in this section which contribute to MCM 6: Good Housekeeping/Pollution Prevention Program.

MCM 6: Good Housekeeping / Pollution Prevention

BMP 1: Municipal Facility Operations

Permit Requirement Citation: Part IV, Sections D.5.a-c, D.5.d.2.a-b, D.5.f

Activity: The MS4 will direct Good Housekeeping/Pollution Prevention practices to be followed within the property of municipal maintenance facilities.

Objective: To equip employees with resources needed to prevent pollutants associated with maintenance facility activities from leaving the property through stormwater runoff and by making routine evaluation of Best Management Practices part of the routine operation.

Evaluation Measures/Measurable Goals:

Performance:

1. Maintain and update as needed an accurate inventory of all municipal facilities that conduct maintenance.
2. Maintain criteria for distinguishing high priority facilities.
3. Track when and why facility conditions and priorities change.
4. Update and maintain site-specific stormwater runoff control plans with standard operating procedures for general good housekeeping practices, storage of de-icing materials, fueling operations, vehicle maintenance, and equipment and vehicle washing at all high priority facilities.
5. Conduct routine and comprehensive inspections and visual monitoring at all high priority facilities.

Effectiveness:

1. Determination of High Priority facilities is based on the intensity, duration, and frequency of Building and Grounds Maintenance, Vehicle and Equipment Maintenance, Product Material Storage, Bulk Tank Storage, and Waste Material Management
2. Maintenance facility BMPs target measures that control all pollutants causing impairment or that are in a TMDL issued for local receiving waters.
3. Inspection and corrective action documentation demonstrates facility improvements that protect water quality.
4. The PEO Strategy includes information and training needed for facilities staff members to conduct self-inspections and to follow standard operating procedures.

Implementation Schedule:	Permit Year				
	1	2	3	4	5
Develop maintenance facility inventory with a map, assessment instrument and procedures for determining facilities that are high priority.	✓				
Conduct risk assessment of all municipal facilities that conduct maintenance and develop stormwater runoff control plans for high priority facilities.	✓				
Maintain current list of facilities and evaluation scores, noting when conditions change.	✓	✓	✓	✓	✓
Conduct routine and comprehensive inspections and visual monitoring, documenting findings and recording corrective actions taken.	✓	✓	✓	✓	✓

BMP Targets: Training, Inspections, Corrective Actions, Documentation, Proactive Solutions

MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations

BMP 2: Municipal Storm Drain System Maintenance

Permit Requirement Citation: Part IV, Sections D.5.a, D.5.d.1, D.5.d.2.a, D.5.d.4, D.5.f

Activity: The MS4 will provide maintenance for the municipal storm drain system, public structural stormwater BMPs, and public green infrastructure practices.

Objective: To remove material and pollutants that do not belong in the storm drain system or that are impacting the integrity of Best Management Practices designed to protect water quality.

Evaluation Measures/Measurable Goals:

Performance:

1. Adopt a method of material dewatering and disposal practices for waste collected during open channel, structural control and catch basin cleaning to be implemented by the MS4.
2. Conduct and track open channel, structural control, and catch basin inspections {Benchmark}.
3. Conduct and track open channel, structural control and catch basin cleaning.
4. Track amount of waste material collected, dewatered, and disposal by the City or contractor and cost to MS4.

Effectiveness:

1. The inspection and cleaning schedule prioritizes stormwater drainage systems that directly discharge to impaired streams or streams that have a TMDL.
2. The inspection findings allow the MS4 to target GHPP practices and to target education in drainage areas that experience higher frequency of pollution problems.

	Permit Year				
Implementation Schedule:	1	2	3	4	5
Coordinate within Departments to establish a written dewatering procedure and schedule of maintenance activities and resources that can be included in the SWMP.	✓				
Include required practices in Contractor Agreement standard language if needed.	✓	✓	✓	✓	✓
Coordinate resources required for inspecting and cleaning open channels, structural controls and catch basins and track efforts.	✓	✓	✓	✓	✓
Estimate the frequency and/or number of inspections and maintenance efforts planned for the following year and resources required to submit with Annual Report.	✓	✓	✓	✓	✓

BMP Targets: Dewatering Practices, Tracking Methods, Prioritizing Efforts

MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations

BMP 3: Municipal Street and Parking Lot Maintenance

Permit Requirement Citation: Part IV, Sections D.5.d.2.a, D.5.d.3, D.5.f

Activity: The MS4 will develop and follow Best Management Practices for winter maintenance as well as sweeping and cleaning operations for municipal streets and parking lots.

Objective: To limit winter maintenance materials applied and to remove material and pollutants that collect on paved surfaces and would otherwise be carried into the storm drain system during rain events.

Evaluation Measures/Measurable Goals:

Performance:

1. Adopt a method of material dewatering and disposal practices for waste collected during street and parking lot sweeping to be implemented by the MS4.
2. Conduct street and parking lot cleaning and track miles covered and approximate weight of waste collected.
3. Conduct winter maintenance operations and track pre-freeze diversion and post-freeze maintenance measures, miles covered and approximate weight of material (salt and sand) distributed.

Effectiveness:

1. The winter maintenance and sweeping schedule prioritizes protection of stormwater drainage systems that directly discharge to impaired streams or streams that have a TMDL.
2. The effectiveness of the streets and parking lot maintenance program is improved through research conducted for the Evaluation and Assessment Plan to evaluate salt management methods.
3. The MS4 utilizes salt alternatives such as pre-freeze diversion measures and product substitutions for winter maintenance where public safety is not diminished.

Implementation Schedule:	Permit Year				
	1	2	3	4	5
Coordinate within Departments to establish a written dewatering procedure and schedule of maintenance activities and resources that can be included in the SWMP.	✓	✓			
Include required practices in Contractor Agreement standard language.	✓	✓	✓	✓	✓
Coordinate resources required for street cleaning and winter maintenance operations and track efforts.	✓	✓	✓	✓	✓
Estimate the frequency and/or amount of activities planned for the following year and resources required to submit with Annual Report.	✓	✓	✓	✓	✓

BMP Targets: Dewatering Practices, Tracking Methods, Alternative Practices, Public Safety

