

**NPDES PHASE II  
MS4 GENERAL PERMIT  
STORM WATER QUALITY MANAGEMENT PLAN  
PART C: PROGRAM IMPLEMENTATION UPDATE**

Morgan County Partnership for Water Quality

Morgan County

Town of Brooklyn

City of Martinsville

Town of Mooresville

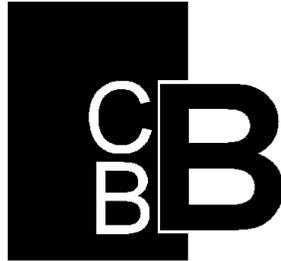
Tri-County Conservancy District

**MORGAN CO-PERMITTEES**

**PERMIT #INR040099**

**OCTOBER 15, 2010**





**NPDES PHASE II  
STORM WATER QUALITY MANAGEMENT PLAN (SWQMP)  
PART C: PROGRAM IMPLEMENTATION UPDATE**

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**Morgan County Co-Permittees**

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CBBEL Project Number 08-522

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**LIST OF EXHIBITS**

1. Morgan County Co-Permittee's MS4 Area

**LIST OF APPENDICES**

- A. References
- B. Acronyms
- C. Listing of Active Industrial Facilities – Indiana Chamber of Commerce
- D. Listing of Active Industrial Facilities – Mooresville Stormwater Department

**SUPPLEMENTAL MATERIAL**

Illicit Discharge Detection and Elimination (IDDE) Plan (bound separately and available to Agencies upon request)

Stormwater Management Ordinance (bound separately and available to Agencies upon request)

# Morgan County, Indiana NPDES Phase II Part C Implementation Plan Update

## 1.0

## INTRODUCTION

As part of the 1987 amendments to the federal Clean Water Act (CWA), the United States Congress added Chapter 402(p) to the CWA to address the water quality impacts of stormwater discharges from industrial facilities and large to medium municipal separate storm sewer systems (MS4s). Large to medium MS4s were defined as communities serving populations of 100,000 or more and are regulated by the Environmental Protection Agency (EPA) under the National Pollutant Discharge Elimination System's (NPDES) Stormwater Phase I Program.

In addition to these amendments, Congress directed the EPA to issue further regulations to identify and regulate additional stormwater discharges that were considered to be contributing to national water quality impairments. On December 8, 1999, the EPA issued regulations that expanded the existing NPDES Stormwater Program to include discharges from small MS4s in "urbanized areas" serving populations of less than 100,000 and stormwater discharges from construction activities that disturb more than one acre of land. These regulations are referred to as the NPDES Phase II Stormwater Program. Within Morgan County, there are 5 entities designated as regulated MS4s due to their total population and density. These entities have combined their efforts as co-permittees to better utilize existing programs and to provide unified and consistent regulations throughout the county. They are Morgan County, the Cities of Martinsville and Mooresville, the Town of Brooklyn, and the Tri-County Conservancy District (herein referred to as the Co-Permittees).

In the State of Indiana, the Indiana Department of Environmental Management (IDEM) is responsible for the development and oversight of the NPDES Phase II Program. The IDEM initiated adoption of the Phase II Rules that were ultimately codified as 327 IAC 15-13 (Rule 13). Rule 13 became effective on August 6, 2003 and requires designated MS4 entities to apply for permit coverage by submitting a Notice of Intent (NOI) and developing Stormwater Quality Management Plans (SWQMPs) through a phased submittal process. The IDEM's phased submittal requirements for the SWQMP include the following three components:

- Part A: Initial Application
- Part B: Baseline Characterization Report
- Part C: Program Implementation Plan

Within the second permit term, Co-Permittees' renewal NOI and SWQMP Part A were submitted to IDEM on December 11, 2008. This report has been prepared to address Rule 13 requirements for updating the SWQMP Part C: Program Implementation Report. According to 327 IAC 15-13-19(e), "Subsequent permits will require the MS4 operator to maintain, and where possible, improve their performance in implementing the 6 MCMs." It is intended that this updated SWQMP Part C replace the information provided in the originally submitted SWQMP Part C (2005). Portions of this document are highlighted to indicate what information has changed from the development of the 2005 Part C during the first permit term, or where MCMs and/or individual BMPs have been enhanced to improve the overall program performance as intended by 327 IAC 15-13-19(e) noted above.

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**2.0**

**MS4 AREA DESCRIPTION**

Rule 13 requires a narrative and mapped description of the MS4 area boundaries and an estimate of the linear feet of MS4 conveyances within the MS4 area. The following discussion provides an evaluation for the municipal stormwater conveyance system within the Co-Permittee's MS4 area. The map of the MS4 area boundaries is shown on **Exhibit 1**.

**2.1 NARRATIVE DESCRIPTION OF MS4 AREA**

Morgan County is located in central Indiana, south of Hendricks and Marion Counties. The Morgan County Partnership for Water Quality is working under a joint permit to fulfill requirements of Rule 13. The MS4 area covered by this permit (herein referred to as the Morgan Co-Permittee's MS4 Area) is shown in Exhibit 1 and includes the corporate boundaries of Brooklyn, Martinsville, Mooresville, Tri-County Conservancy District, and part of unincorporated Morgan County. Specifically, the parts of the County included in the MS4 are described as the unincorporated portions of:

- T13N, R1E, Sec 1, 4, 5, 12, 13, 23, 24, 25, 26
- T13N, R2E, Sec 2, 3, 4, 5, 6, 7, 8, 9, 13, 24
- T14N, R1E, Sec 25, 26, 27, 28, 32, 33, 35
- T14N, R2E, Sec 27, 28, 29, 30, 31, 32, 33, 34, 35, 36

**2.2 DESCRIPTION OF MS4 CONVEYANCE SYSTEMS**

The Co-Permittees were required by 327 IAC 15-13-14 to "...develop a storm sewer system map showing the location of all outfalls and MS4 conveyances in the particular MS4 area under the MS4 operator's control and the names and locations of all waters that receive discharges from those outfalls." During the first permit term, "All known conveyance systems with a pipe diameter of 12 inches or larger and open ditches with 2 foot or larger bottom width" were to be mapped. During subsequent permit terms, the remaining outfall conveyance systems need to be mapped. These requirements do not include private or mutual drains, yard swales that are not maintained by a regulated MS4 entity, or curbs and gutters.

**2.3 PRIORITY AREAS AND CONCERNS**

The Rule 13 SWQMP-Part B required the identification of areas having reasonable potential for or actually causing stormwater quality problems based upon relevant land use data and identified sensitive areas, as well as, existing and available water quality data.

The Co-Permittees identified agricultural and urbanizing land uses (in relation to the potential impacts to highly erodible soils, soils unsuitable for septic systems, and wetlands) as potential problem areas in their Part B submittal. In order to address potential water quality impacts associated with agricultural land uses, the Co-Permittees will continue to work with the Morgan County Soil and Water Conservation District (SWCD) to provide education and outreach and assistance to agricultural and suburban landowners.

The individual entities' original Part B submittals also identified priority watersheds. The individual entities' intent was to focus initial stormwater program implementation within these priority watersheds. However, the entities have since entered into a Co-Permit status and as such, the Co-Permittees have determined that all watersheds within the MS4 area will be

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considered priorities for initial program implementation. This approach will simplify program implementation and should maximize the overall benefit that the stormwater program has on all local receiving waters.

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**3.0**

**MCM #1**

**PUBLIC EDUCATION AND OUTREACH**

Rule 13 requires that residents, visitors, public service employees, commercial and industrial facilities, and construction site personnel within the MS4 area be informed about the impacts that polluted stormwater runoff can have on water quality and ways they can minimize their impact on stormwater quality. A reasonable attempt must be made to reach all constituents with the MS4 area. The following discussion provides information on the Co-Permittees' MS4 area Public Education and Outreach Program.

Public Education and Outreach BMPs, outlined in **Table 4-1** located in **Section 4.0**, will be implemented by the Co-permittees in order to comply with the minimum requirements of this MCM. These BMPs have been combined with the BMPs outlined for Public Participation and Involvement (MCM #2) for ease of presentation and discussion. The table provides a summary of the Public Education, Outreach, Participation, and Involvement BMPs to be implemented and identifies the associated measurable goals, programmatic indicator numbers, timelines, priority areas, and responsible parties.

The Co-Permittees' MS4 area, as discussed in Section 2.0, is comprised of both agricultural and urbanizing lands. The Co-Permittees' Public Education, Outreach, Participation, and Involvement Program has therefore been designed to minimize stormwater impacts originating from both urban and rural land uses. This program informs citizens about the impacts of stormwater discharges on waterbodies and steps that can be taken to reduce pollutants in stormwater runoff.

Within Table 4-1, responsible parties are listed for each BMP. To date, the Co-permittees continue to work closely with the Morgan County Soil and Water Conservation District (SWCD) and the Morgan County Solid Waste Management District (SWMD). Both of these agencies provide public education and outreach services while also playing a major role in the public involvement and participation activities.

Further, the Co-permittees have entered into a Memorandum of Agreement (MOA) with the Morgan County SWCD for the implementation of the majority of Rule 13's MCMs #1 and #2. The Co-permittees and the SWCD make up the Morgan County Partnership. The Partnership's name and logo are utilized in all public education and outreach efforts.

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**4.0**

**MCM #2  
PUBLIC PARTICIPATION & INVOLVEMENT**

Rule 13 requires that documented opportunities are given to constituents within the MS4 area to participate in the stormwater management program development and implementation. The MS4 entity must comply with public notice requirements to allow public comment.

Compliance with this MCM requires MS4s to demonstrate that citizens and community members were provided with ample opportunities to participate in the development and implementation of the SWQMP.

Public Participation and Involvement BMPs, outlined in **Table 4-1**, will be implemented by the Co-permittees in order to comply with the minimum requirements of this MCM. These BMPs have been combined with the BMPs outlined for Public Education and Outreach (MCM #1) for ease of presentation and discussion. The Table provides a summary of the Public Education, Outreach, Participation, and Involvement BMPs to be implemented and identifies the associated measurable goals, programmatic indicators, timeline, priority areas, and responsible parties.

Within Table 4-1, responsible parties are listed for each BMP. To date, the Co-permittees continue to work closely with the Morgan County SWCD and the Morgan County SWMD. Both of these agencies provide public education and outreach services while also playing a major role in the public involvement and participation activities.

Further, the Co-permittees have entered into a Memorandum of Agreement (MOA) with the Morgan County SWCD for the implementation of the majority of Rule 13's MCMs #1 and #2. The Co-permittees and the SWCD make up the Morgan County Partnership. The Partnership's name and logo are utilized in all public education and outreach efforts.

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**Table 4-1: Public Education and Outreach BMPs &  
Public Participation and Involvement BMPs**

<b>Best Management Practice (BMP)</b>	<b>BMP Description</b>	<b>Measurable Goals, Tracking, and Programmatic Indicators</b>	<b>Timeline</b>	<b>Responsible Party</b>
<b>Stormwater Awareness Assessments</b>	<ul style="list-style-type: none"> <li>• Determine the feasibility of utilizing pre- and post-activity assessments to gauge the knowledge of the participants and the effectiveness of the event.</li> <li>• Discuss potential incentives for participants completing any awareness assessments provided to the Partnership.</li> </ul>	<ul style="list-style-type: none"> <li>• Utilize completed assessments to evaluate and guide the outreach efforts throughout the second permit term</li> <li>• Track using Programmatic Indicators #1, #2, and #3</li> </ul>	As opportunities arise	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>
<b>Morgan the Turtle</b>	<ul style="list-style-type: none"> <li>• Utilize Morgan the Turtle as the stormwater icon throughout the Partnership's stormwater education program</li> </ul>	<ul style="list-style-type: none"> <li>• Utilize logo on brochures, website, and other program activities as appropriate.</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>
<b>Stormwater Educational Brochures</b>	<ul style="list-style-type: none"> <li>• Distribute 3 brochures addressing:               <ul style="list-style-type: none"> <li>• Lawn Care &amp; Maintenance</li> <li>• Household Hazardous Waste</li> <li>• Prescription Medication Disposal Methods</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Distribute 3 brochures during the 2<sup>nd</sup> permit term</li> <li>• Track # of brochures printed and distributed</li> </ul>	On-going distribution	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>

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Best Management Practice (BMP)	BMP Description	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Responsible Party
<b>Web Site</b>	<ul style="list-style-type: none"> <li>• Updates to individual Co-Permittees' stormwater websites will include appropriate program documentation, articles developed, brochures, and calendar updates</li> <li>• Provide links to other Co-Permittees' websites along with other relevant websites where appropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Update with new information, as needed</li> <li>• Track total number of hits site receives</li> </ul>	<ul style="list-style-type: none"> <li>• On-going, as needed</li> </ul>	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>
<b>Misc. Media</b>	<ul style="list-style-type: none"> <li>• Utilize various types of media (as appropriate and feasible) to enhance the Stormwater Education Program               <ul style="list-style-type: none"> <li>○ Partner's newsletters and websites</li> <li>○ Local print and/or radio media outlets</li> <li>○ Outdoor media (billboards, signage, etc.)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Develop articles as needed and supply to partners and media outlets as appropriate.</li> <li>• Track # of articles or news items developed and provided to partners</li> </ul>	On-going distribution	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>
<b>SWMD Activities</b>	<ul style="list-style-type: none"> <li>• Support SWMD activities to educate school children and community members on the importance of pollution prevention and recycling programs</li> <li>• Support SWMD recycling and collection events</li> </ul>	<ul style="list-style-type: none"> <li>• Promote on-going SWMD activities as needed</li> <li>• Hold 2 recycling and/or collection events per year</li> <li>• Track using Programmatic Indicators #3, #10, #11, and #12</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• TCPWQ</li> <li>• Morgan County SWMD</li> </ul>

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Best Management Practice (BMP)	BMP Description	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Responsible Party
<b>SWCD Activities</b>	<ul style="list-style-type: none"> <li>• Support SWCD activities to educate and encourage agricultural producers to use BMPs</li> <li>• Support SWCD activities to educate school children and community members on the importance of pollution prevention and recycling</li> </ul>	<ul style="list-style-type: none"> <li>• Promote on-going SWCD activities as needed</li> <li>• Include stormwater education information in annual “Ag Day” event</li> <li>• Include stormwater education in an annual field day</li> <li>• Track using Programmatic Indicators #1, #2, and #3</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ</li> <li>• Morgan County SWCD</li> </ul>
<b>Storm Drain Marking</b>	<ul style="list-style-type: none"> <li>• Coordinate storm drain marking events as necessary utilizing volunteers</li> </ul>	<ul style="list-style-type: none"> <li>• Track using Programmatic Indicators #2, #3, and #4</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>
<b>Elementary Education</b>	<ul style="list-style-type: none"> <li>• Conduct a variety of stormwater education activities for Morgan County students.</li> <li>• Highlight ways attendees can minimize their impacts on water quality.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue classroom presentations when appropriate and as requested</li> <li>• Track using Programmatic Indicators #1 and #2</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• Morgan County SWCD</li> <li>• MCPWQ</li> </ul>
<b>Clean-up Event</b>	<ul style="list-style-type: none"> <li>• Partner with local agencies or offices to conduct and promote an annual clean-up event.</li> </ul>	<ul style="list-style-type: none"> <li>• Partner, advertise, and conduct one event annually</li> <li>• Track using Programmatic Indicators #2 and #3</li> </ul>	Annually	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>
<b>Adopt-A-Highway</b>	<ul style="list-style-type: none"> <li>• Partner with the Morgan County Highway Department to organize, promote, and conduct an annual highway clean-up event</li> </ul>	<ul style="list-style-type: none"> <li>• Partner, advertise, and conduct one event annually</li> <li>• Track using Programmatic Indicators #2 and #3</li> </ul>	Annually	<ul style="list-style-type: none"> <li>• Morgan County Highway Department</li> <li>• MCPWQ</li> </ul>

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Best Management Practice (BMP)	BMP Description	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Responsible Party
<b>Hoosier Riverwatch</b>	<ul style="list-style-type: none"> <li>• Determine feasibility of conducting or promoting an annual Hoosier Riverwater event</li> </ul>	<ul style="list-style-type: none"> <li>• Partner, advertise, and conduct one event annually as determined by the MCPWQ</li> <li>• Track using Programmatic Indicators #2 and #3</li> </ul>	Annually	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>
<b>Public Reporting Program</b>	<ul style="list-style-type: none"> <li>• Continue to promote the Public Reporting Program via newspaper articles and on Partner's stormwater websites</li> <li>• Utilize database to track public complaints related to stormwater issues and subsequent actions taken to mitigate valid issues</li> </ul>	<ul style="list-style-type: none"> <li>• Track using Programmatic Indicators #3 and #16</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>
<b>Public Meetings</b>	<ul style="list-style-type: none"> <li>• Provide opportunities for public comment at MCPWQ meetings</li> <li>• Provide updates to the Morgan County Drainage Board at least annually</li> <li>• Provide updates to the Morgan County SWCD at least annually</li> </ul>	<ul style="list-style-type: none"> <li>• Hold public, quarterly MCPWQ meetings</li> <li>• Generate meeting summaries and sign-in sheets for each meeting held</li> <li>• Track using Programmatic Indicators #2 and #3</li> </ul>	<ul style="list-style-type: none"> <li>• Quarterly</li> <li>• Annually</li> <li>• Annually</li> </ul>	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>
<b>Rule 13 Public Participation List</b>	<ul style="list-style-type: none"> <li>• Update and maintain list of groups and individuals that are interested in the MCPWQ activities.</li> <li>• Develop an email contact list of companies, groups, and individuals interested in participation</li> <li>• Utilize spreadsheet to track</li> </ul>	<ul style="list-style-type: none"> <li>• Track using Programmatic Indicators #2 and #3</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>

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Best Management Practice (BMP)	BMP Description	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Responsible Party
	activities and participants			
<b>Fair or Festival Booth</b>	<ul style="list-style-type: none"> <li>• Investigate possible options for permanent or changeable displays for local events.</li> <li>• Have MCPWQ display at selected events such as the Morgan County Fair and/or Old Settlers Day, based on determinations of the MCPWQ</li> </ul>	<ul style="list-style-type: none"> <li>• Have MCPWQ display booth at 1 or more selected events per year.</li> </ul>	<ul style="list-style-type: none"> <li>• Investigation of display options anticipated to occur in 2011</li> <li>• Begin display set up in 2011</li> </ul>	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>
<b>Rain Barrel &amp; Rain Garden Programs</b>	<ul style="list-style-type: none"> <li>• Continue established rain barrel &amp; rain garden programs</li> </ul>	<ul style="list-style-type: none"> <li>• Offer sales of rain barrels continually</li> <li>• Hold at least 1 rain garden education presentation per year</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• Morgan County SWCD</li> <li>• MCPWQ</li> </ul>
<b>Strategic Plan</b>	<ul style="list-style-type: none"> <li>• Develop Strategic Plan to help guide overall efforts for MCMs #1 and #2</li> </ul>	<ul style="list-style-type: none"> <li>• Complete plan in 2011</li> <li>• Update as needed</li> </ul>	Complete in 2011	<ul style="list-style-type: none"> <li>• MCPWQ</li> </ul>

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**5.0**

**MCM #3**

**ILLCIT DISCHARGE DETECTION AND ELIMINATION**

Rule 13 requires the development and implementation of a strategy to detect and eliminate illicit discharges to the MS4 conveyance, including illegal dumping into the MS4 conveyance. Problem areas must be located via dry weather screening or other means, the source must be determined, illicit connections must be removed or otherwise corrected, and the actions taken must be documented. All active industrial facilities within the MS4 area that discharge into the MS4 conveyance must also be documented. Through an ordinance or other regulatory mechanism, illicit discharges must be prohibited from entering the MS4 conveyances and appropriate enforcement procedures and actions are required.

All public employees, businesses, and the general public must be educated about the hazards associated with illicit discharges and the improper disposal of waste. The educational effort must include informational brochures and guidance for specific audiences and school curricula and the public reporting of illicit discharges and spills. In order to give the public alternatives to improper disposal of wastes, the MS4 entities must initiate or help coordinate existing recycling programs in the MS4 area for commonly dumped wastes, such as motor oil, antifreeze, and pesticides.

The Stormwater Illicit Discharge Detection and Elimination (IDDE) BMPs, outlined in **Table 5-1**, will be implemented by the Co-Permittees in order to comply with the minimum requirements of this MCM. The Co-Permittees' programs are designed to gain a thorough awareness of their separate storm conveyance system and thereby allowing the identification and elimination of illicit discharges entering the system. The program also establishes the legal, technical, and educational means needed to eliminate illicit discharges.

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**Table 5-1: Illicit Discharge Detection and Elimination BMPs**

<b>Best Management Practice (BMP)</b>	<b>BMP Description</b>	<b>Measurable Goals, Tracking, and Programmatic Indicators</b>	<b>Timeline</b>	<b>Responsible Party</b>
<b>Stormwater System Mapping</b>	<ul style="list-style-type: none"> <li>Map new outfalls or conveyance systems through as-builts as development occurs within each jurisdiction.</li> </ul>	<ul style="list-style-type: none"> <li>Track using Programmatic Indicator #5 and #6</li> </ul>	On-going	<ul style="list-style-type: none"> <li>MCPWQ Entities</li> </ul>
<b>IDDE Ordinance</b>	<ul style="list-style-type: none"> <li>Periodically review IDDE Ordinance language for needed updates and to ensure compliance with Rule 13.</li> </ul>	<ul style="list-style-type: none"> <li>Continue to enforce IDDE Ordinance</li> <li>Review Ordinance at least once per permit term.</li> <li>Track using Programmatic Indicator #9</li> </ul>	On-going	<ul style="list-style-type: none"> <li>MCPWQ Entities</li> </ul>
<b>IDDE Plan</b>	<ul style="list-style-type: none"> <li>Review IDDE Plan and update as necessary to reflect the proposed actions for illicit discharge detection and elimination in the current permit term</li> <li>Continue to implement IDDE plan to detect, address, and eliminate illicit discharges into the MS4 conveyance system within their jurisdictions</li> </ul>	<ul style="list-style-type: none"> <li>Track using Programmatic Indicators #7 and #8</li> </ul>	<ul style="list-style-type: none"> <li>The IDDE Plan will be reviewed/ updated in 2010</li> <li>On-going IDDE Plan implementation</li> </ul>	<ul style="list-style-type: none"> <li>MCPWQ Entities</li> </ul>
<b>Public Reporting Program</b>	<i>This item, previously listed here, has been discussed within MCMs #1 and #2 in Table 4-1.</i>			
<b>Storm Drain Markers</b>	<i>This item, previously listed here, has been discussed within MCMs #1 and #2 in Table 4-1.</i>			
<b>SWMD Activities</b>	<i>This item, previously listed here, has been discussed within MCMs #1 and #2 in Table 4-1.</i>			
<b>Annual IDDE, Good Housekeeping &amp; Pollution Prevention Staff Training</b>	<i>This item, previously listed here, has been moved to the discussion related to MCM #6 in Table 8-1 under Annual IDDE, Good Housekeeping &amp; Pollution Prevention Staff Training.</i>			

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**6.0**

**MCM #4**

**CONSTRUCTION SITE STORMWATER RUNOFF CONTROL**

Rule 13 requires the development of an ordinance or other regulatory mechanism and establishment of a construction program that controls polluted runoff from construction activities that disturb one or more acres of land in the MS4 area. This construction program must include a permitting process, erosion control plan review process, site inspections, and enforcement. The permitting process must include a requirement for the construction project site owner to submit a copy of the permit application directly to IDEM. MS4 entities must provide an opportunity for local SWCD to provide comments and recommendations to the MS4 operator on individual projects.

According to Rule 13, the construction program must include requirements for the implementation of appropriate BMPs on construction sites to control sediment, erosion, and other waste. MS4 entities must review and approve construction plans submitted by the construction site operator before construction activity commences. Procedures must be developed for site inspection and enforcement to ensure that BMPs are properly installed. These procedures must include a means to identify priority sites for inspection and enforcement, as well as a means to receive and consider public inquiries, concerns, and information submitted regarding local construction activities. A tracking process must be implemented in which submitted public information is documented and then given to appropriate staff for follow up. MS4 area personnel responsible for plan review, inspection, and enforcement of construction activities shall receive annual training.

Compliance with this MCM requires MS4s to develop, implement, manage, and enforce an erosion and sediment control program for construction activities that disturb one or more acres of land within the MS4 area. **Table 7.1** in **Section 7.0** provides a detailed description of the Construction and Post-Construction Site Stormwater Runoff Control BMPs to be implemented and identifies the measurable goals, programmatic indicators, timelines, priority areas, and responsible parties. These BMPs have been combined with the Post-Construction Site Stormwater Runoff Control BMPs (MCM #5) for ease of presentation and discussion.

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**7.0**

**MCM #5**

**POST-CONSTRUCTION SITE STORMWATER RUNOFF CONTROL**

Rule 13 requires the development of an ordinance or other regulatory mechanism and establishment of a post-construction program that addresses runoff from new development and redevelopment areas that disturb one or more acres of land in the MS4 area. This program must include a permitting process, plan review process, site inspections, and enforcement. MS4 area personnel responsible for plan review, inspection, and enforcement of post-construction BMPs shall receive annual training.

Where appropriate, MS4 entities must use a combination of storage, infiltration, filtering, or vegetative practices to reduce the impact of pollutants in stormwater runoff on receiving waters in areas that are the responsibility of the MS4 entity. A written Operational and Maintenance (O&M) Plan must be developed and implemented for all existing stormwater structural BMPs, which are under the control of the MS4 entity. As new post-construction BMPs are added to areas under the control of the MS4 entity, the O&M Plan must be updated accordingly. The Cooperatives started developing O&M Plans for their self-owned BMPs and requiring them for new or redeveloped project sites after their Comprehensive Stormwater Management Ordinances were adopted in 2004.

Compliance with this MCM requires MS4s to develop a program for managing Post-Construction Stormwater Runoff Control BMPs that will ensure adequate, long-term stormwater quality benefits in new development and redevelopment activities. Once construction is complete, post-construction practices specified by the MS4 must be implemented to ensure adequate stormwater quality is maintained from the developed site via an enforceable ordinance or other regulatory mechanism. **Table 7-1** provides a summary of the Construction and Post-Construction Site Stormwater Runoff Control BMPs to be implemented and identifies the associated measurable goals, programmatic indicators, timeline, priority areas and responsible parties. These BMPs have been combined with the Construction Site Stormwater Runoff Control BMPs (MCM #4) for ease of presentation and discussion.

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**Table 7-1: Construction & Post-construction Site Stormwater Runoff Control BMPs**

Best Management Practice (BMP)	BMP Description	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Responsible Party
<b>Stormwater Management Ordinance</b>	<ul style="list-style-type: none"> <li>Review the Construction and Post-Construction Site Ordinance language for needed updates and to ensure compliance with current Rule 13 language</li> </ul>	<ul style="list-style-type: none"> <li>Continue to update and enforce the Construction and Post-Construction Site Stormwater Management Ordinance</li> <li>Each Co-permittee will revise and tailor ordinance language for their community as appropriate</li> </ul>	On-going	<ul style="list-style-type: none"> <li>MCPWQ Entities</li> </ul>
<b>Stormwater Technical Standards</b>	<ul style="list-style-type: none"> <li>Review the Construction and Post-Construction Site Stormwater Technical Standards for needed updates</li> </ul>	<ul style="list-style-type: none"> <li>Continue to review and approve proposed new and redevelopment projects for compliance with the Stormwater Technical Standards</li> <li>Update standards as needed</li> </ul>	On-going	<ul style="list-style-type: none"> <li>MCPWQ Entities</li> </ul>
<b>Operation &amp; Maintenance (O&amp;M) Manuals</b>	<ul style="list-style-type: none"> <li>Continue to require that O&amp;M manuals are to be submitted for all Post-Construction BMPs identified as part of a project submittal package</li> </ul>	<ul style="list-style-type: none"> <li>Continue to enforce ordinance requirements for O&amp;M plan submittal and plan contents</li> <li>Track using Programmatic Indicator #19</li> </ul>	On-going	<ul style="list-style-type: none"> <li>MCPWQ Entities</li> </ul>
<b>Plan Review, Site Inspection, and Enforcement</b>	<ul style="list-style-type: none"> <li>Continue their review of project plans, conducting site inspections, and actively enforcing the Ordinances and Technical Standards</li> </ul>	<ul style="list-style-type: none"> <li>Continue to review and approve proposed new and redevelopment projects</li> <li>Continue to review 100% of construction plans and complete site inspections for compliance</li> <li>Track using Programmatic Indicators #13, #14, #15, #17, #18, #19, and #20</li> </ul>	On-going	<ul style="list-style-type: none"> <li>MCPWQ Entities</li> </ul>

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Best Management Practice (BMP)	BMP Description	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Responsible Party
<b>Staff Training</b>	<ul style="list-style-type: none"> <li>All staff responsible for plan review, site inspection, and enforcement related to construction and post-construction requirements will receive annual training</li> </ul>	<ul style="list-style-type: none"> <li>Continue to provide relevant training to all staff involved in plan review, site inspection, and enforcement requirements for Construction and Post-Construction MCMs</li> <li>Track using Programmatic Indicator #2</li> </ul>	Annually	<ul style="list-style-type: none"> <li>MCPWQ Entities</li> </ul>
<b>Training for Construction Professionals</b>	<ul style="list-style-type: none"> <li>Provide information related to training opportunities via websites, email distribution, or through printed materials as appropriate</li> <li>Utilize pre-construction meetings as a forum for training and discussions regarding relevant stormwater issues</li> </ul>	<ul style="list-style-type: none"> <li>Track using Programmatic Indicator #2</li> </ul>	On-going	<ul style="list-style-type: none"> <li>MCPWQ Entities</li> </ul>
<b>Public Reporting Program</b>	<i>This item, previously listed here, has been discussed within MCMs #1 and #2 in Table 4-1.</i>			
<b>Erosion and Sediment Control and Post-construction BMP Tracking Database</b>	<ul style="list-style-type: none"> <li>Continue tracking the status of construction projects, erosion and sediment control activities, and post-construction BMPs</li> <li>Tracking will also be completed for violations, complaints, and public information requests</li> </ul>	<ul style="list-style-type: none"> <li>Continue to track active construction and post-construction project sites</li> <li>Track using Programmatic Indicators #17, #18, and #20</li> </ul>	On-going	<ul style="list-style-type: none"> <li>MCPWQ Entities</li> </ul>

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<b>Best Management Practice (BMP)</b>	<b>BMP Description</b>	<b>Measurable Goals, Tracking, and Programmatic Indicators</b>	<b>Timeline</b>	<b>Responsible Party</b>
<b>Inspection and Enforcement Documentation</b>	<ul style="list-style-type: none"> <li>• Continue to complete active construction site inspection forms</li> <li>• Begin documenting inspections of post-construction BMPs</li> </ul>	<ul style="list-style-type: none"> <li>• Complete forms for active construction sites and post-construction BMPs inspected</li> <li>• Develop and adopt Post-Construction program components</li> <li>• Enter inspection and follow-up information into database</li> <li>• Track using Programmatic Indicators #14 &amp; #18</li> </ul>	<ul style="list-style-type: none"> <li>• On-going for construction sites</li> <li>• Post - construction tools to ensure compliance will be developed in 2011</li> </ul>	<ul style="list-style-type: none"> <li>• MCPWQ</li> <li>• Entities</li> </ul>
<b>Co-permittee Rule 5 Compliance</b>	<ul style="list-style-type: none"> <li>• Continue to comply with Rule 5 on each Co-Permittees' owned and operated projects that disturb land equal to 1 acre or larger in size</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to comply with Rule 5 on each entity's owned and operated projects</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ</li> <li>• Entities</li> </ul>
<b>Gasoline Outlets</b>	<ul style="list-style-type: none"> <li>• As requests for new gasoline outlets or municipal, state, federal, or institutional refueling areas are proposed, stormwater BMPs will be installed on the site.</li> </ul>	<ul style="list-style-type: none"> <li>• Installation of stormwater BMPs at new refueling areas is completed.</li> </ul>	On-going, as needed	<ul style="list-style-type: none"> <li>• MCPWQ</li> <li>• Entities</li> </ul>

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**8.0**

**MCM #6**

**POLLUTION PREVENTION AND GOOD HOUSEKEEPING**

Rule 13 requires the development and implementation of a program to prevent or reduce polluted runoff from municipal operations within the MS4 area. The program must include written documentation of maintenance activities, maintenance schedules, and long term inspection procedures for BMPs to reduce floatables and other pollutants discharged from the separate storm sewers.

Controls must be implemented for reducing or eliminating the discharge of pollutants from operational areas, including roads, parking lots, maintenance and storage yards, and waste transfer stations. Written procedures must be developed and implemented for the proper disposal of waste or materials removed from separate storm sewer systems and operational areas. New flood management projects must be assessed via written documentation for their impacts on water quality and existing flood management projects must be examined for incorporation of additional water quality protection devices or practices. MS4 entity employees must be properly trained on various topics such as herbicide and insecticide application and the function of BMPs. Such training must be documented in writing.

**Table 8-1** provides a summary of the Pollution Prevention and Good Housekeeping BMPs to be implemented and identifies the associated measurable goals, programmatic indicators, environmental benefits, timeline, priority areas and responsible parties associated with each BMP. A detailed description of each BMP is provided below.

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**Table 8-1: Pollution Prevention and Good Housekeeping BMPs**

Best Management Practice (BMP)	BMP Description	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Responsible Party
<b>Annual IDDE, Good Housekeeping, &amp; Pollution Prevention Staff Training</b>	<ul style="list-style-type: none"> <li>• Offer or provide opportunities to appropriate staff for annual training related to IDDE and/or Good Housekeeping and Pollution Prevention topics</li> <li>• Complete annual walk-through of MS4 facilities to follow-up on self monitoring and to utilize as training.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue annual training program</li> <li>• Track using Programmatic Indicators #2 and #3</li> </ul>	Annually	<ul style="list-style-type: none"> <li>• MCPWQ Entities</li> </ul>
<b>MS4 Conveyance System Maintenance</b>	<ul style="list-style-type: none"> <li>• Continue program to inspect and maintain the MS4 conveyance systems within their jurisdictions</li> <li>• Document disposal of wastes removed from MS4 conveyance systems</li> </ul>	<ul style="list-style-type: none"> <li>• Continue inspection and maintenance program</li> <li>• Prioritize maintenance needs based on inspections and make conveyance systems improvements as funding allows</li> <li>• Track using Programmatic Indicators #26, #27, #28, #29, and #32</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ Entities</li> </ul>
<b>Maintenance Schedules Tracking</b>	<ul style="list-style-type: none"> <li>• Track maintenance activities associated with Good Housekeeping and Pollution Prevention</li> <li>• This will include items such as maintenance on oil/water separators, catch basin inserts, inspection reports, etc</li> </ul>	<ul style="list-style-type: none"> <li>• Continue tracking maintenance activities and schedules</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ Entities</li> </ul>
<b>Street Sweeping Program</b>	<ul style="list-style-type: none"> <li>• Maintain regularly scheduled street and parking lot sweeping and/or vacuuming operations</li> <li>• Co-Permittees will periodically</li> </ul>	<ul style="list-style-type: none"> <li>• Periodic evaluation of implementing a street sweeping program</li> <li>• Track using Programmatic</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ</li> <li>• Brooklyn</li> </ul>

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<b>Best Management Practice (BMP)</b>	<b>BMP Description</b>	<b>Measurable Goals, Tracking, and Programmatic Indicators</b>	<b>Timeline</b>	<b>Responsible Party</b>
	evaluate the efficacy and effectiveness of implementing a street sweeping program	Indicator #33		<ul style="list-style-type: none"> <li>• Martinsville</li> <li>• Mooresville</li> </ul>
<b>Canine Park Location</b>	<ul style="list-style-type: none"> <li>• When proposed, the Co-permittees will review any projects for Canine Parks to ensure proper location away from waterbodies</li> </ul>	<ul style="list-style-type: none"> <li>• Track the number and location of canine parks sited at least one hundred fifty (150) feet away from a surface waterbody</li> <li>• Track using Programmatic Indicator #34 when applicable</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ Entities</li> </ul>
<b>Flood Management Projects</b>	<ul style="list-style-type: none"> <li>• Continue to assess new projects for incorporation of water quality devices or practices</li> </ul>	<ul style="list-style-type: none"> <li>• Document that all new projects are assessed for incorporation of additional water quality devices or practices</li> </ul>	On-going	<ul style="list-style-type: none"> <li>• MCPWQ Entities</li> </ul>

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Best Management Practice (BMP)	BMP Description	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Responsible Party
<p style="text-align: center;"><b>Stormwater Pollution Prevention Plans (SWPPPs)</b></p>	<ul style="list-style-type: none"> <li>• Evaluate listing of properties owned or operated by each Co-Permittee</li> <li>• Develop additional SWPPPs or SOPs if necessary</li> <li>• Include facility inspection sheets, employee training form, spill documentation, etc.</li> <li>• This general BMP covers previously listed specific BMPs such as:               <ul style="list-style-type: none"> <li>○ Salt and Sand Management</li> <li>○ Snow Disposal Areas</li> <li>○ Secondary Containment</li> <li>○ Fertilizer and Pesticide Management</li> <li>○ Chemical Spill and Response Plan</li> <li>○ Disposal of Waste</li> <li>○ Vehicle Maintenance and Washing</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Utilize SWPPP and sheets to track inspections, training, etc for each facility</li> <li>• Track using Programmatic Indicators #2, #3, #17, #18, #19, #20, #30, #31, #32</li> </ul>	<ul style="list-style-type: none"> <li>• Additional SWPPPs will be developed as needed</li> </ul>	<ul style="list-style-type: none"> <li>• MCPWQ Entities</li> </ul>

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**9.0 RULE 13 MEASURABLE GOALS APPROACH**

The presumptive approach of implementing the Rule 13 program assumes that overall stormwater quality will improve each year by reducing the amounts of pollutants entering the conveyance system. Specific target outreach, reduction goal percentages, compliance goals, and/or implementation goals will be correlated to amounts of BMPs conducted, installed, or implemented, as well as, amounts of material collected from BMPs, and/or plans implemented. For example:

- Specific target outreach can focus on educating either a specific population sector or a pollutant of concern, thereby assuming that a knowledgeable public will be inclined to help reduce their impacts on pollutant loadings.
- Greater constituent participation will result in greater reductions of certain stormwater pollutants.
- When a certain amount of street sweeping material is collected, it is assumed that the unknown total amount of material entering the conveyance system is reduced by the amount collected.

**Table 9-1** highlights the individual MCMs, the Rule 13 language associated with the development of specific target outreach, reduction goal percentages, compliance goals, and/or implementation goals for each MCM, and the approach taken by the Co-Permittees to comply with the Rule language. Timelines and detailed goals for each BMP will vary and this information can be found in the individual MCM tables in previous sections.

**Table 9-1: Measurable Goals Approach Summary**

MCM	Rule 13 Language	Co-Permittee's Approach
Education/ Outreach  15-13-12(c)	<ul style="list-style-type: none"> <li>• Must identify specific target outreach <b>or</b> reduction goal percentages <b>and</b> timetables</li> <li>• Goals must address relevant targeted audience improvement:                             <ol style="list-style-type: none"> <li>1. Disposal practices</li> <li>2. Cast storm drain cover installations</li> <li>3. School curricula or website implementation</li> <li>4. Outreach to every population sector</li> <li>5. Educational material distribution</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>Specific target outreach BMPs:</b> Morgan the Turtle Stormwater Educational Brochures Website Misc. Media SWMD Activities SWCD Activities Elementary Education Fair or Festival Booths Rain Garden &amp; Rain Barrel Programs Strategic Plan</li> </ul>
Participation/ Involvement  15-13-13(c)	<ul style="list-style-type: none"> <li>• Must identify specific outreach <b>and</b> reduction goal percentages <b>and</b> timetables</li> <li>• Goals must address relevant community participation in:                             <ol style="list-style-type: none"> <li>1. Citizen panels</li> <li>2. Community clean-ups</li> <li>3. Citizen watch groups and drain marking projects</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>Specific outreach BMPs:</b> Stormwater Awareness Assessments Website SWMD Activities SWCD Activities Storm Drain Marking Elementary Education Clean-up Event</li> </ul>

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MCM	Rule 13 Language	Co-Permittee's Approach
	4. Public meeting notification	Adopt-A-Highway Hoosier Riverwatch Public Reporting Program Public Meetings Rule 13 Public Participation List Rain Garden & Rain Barrel Programs • <b>Reduction goal percentages</b> <u>Tracking:</u> Tons of trash, debris collected Increase in participation <i>(assessments, meetings, etc.)</i>
IDDE 15-13-14(j)	<ul style="list-style-type: none"> <li>• Must identify specific outreach <b>and</b> reduction percentages <b>and</b> timetables</li> <li>• Goals must address relevant:               <ol style="list-style-type: none"> <li>1. Collection system mapping</li> <li>2. Regulatory mechanism implementation</li> <li>3. Employee training</li> <li>4. Household hazardous waste programs</li> <li>5. Illicit discharge detection</li> <li>6. Illicit discharge elimination</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>Specific outreach</b>  <u>BMPs:</u>                Stormwater System Mapping                IDDE Ordinance                IDDE Plan                Public Reporting Program                Storm Drain Markers                SWCD Activities                Annual IDDE, Good Housekeeping &amp; Pollution Prevention Staff Training</li> <li>• <b>Reduction percentages</b>  <u>Tracking:</u>                Stormwater System Mapping additions                IDDE Ordinance enforcement                IDDE Plan activities <i>(screening, follow up, eliminations)</i>                Complaints received                Drains marked <i>(participants and groups involved)</i>                Materials collected by SWMD                Staff trained</li> </ul>

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MCM	Rule 13 Language	Co-Permittee's Approach
<p>Construction 15-13-15(h)</p>	<ul style="list-style-type: none"> <li>• Must identify specific outreach, compliance, <b>and</b> implementation goal percentages <b>and</b> timetables</li> <li>• Goals must address relevant:               <ol style="list-style-type: none"> <li>1. Regulatory mechanism implementation</li> <li>2. Public informational request procedure implementation</li> <li>3. Site inspection procedure implementation</li> <li>4. Construction site operator compliance improvement</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>Specific outreach</b> <u>BMPs:</u> Staff Training Training for Construction Professionals</li> <li>• <b>Compliance goals</b> <u>BMPs:</u> Plan review, Site Inspection, and Enforcement BMP Tracking Database Inspection and Enforcement Documentation Co-permittee's Rule 5 Compliance</li> <li>• <b>Implementation goals</b> <u>BMPs:</u> Ordinance and Technical Standards</li> </ul>
<p>Post-Construction 15-13-16(f)</p>	<ul style="list-style-type: none"> <li>• Must identify specific reduction percentages <b>and</b> timetables</li> <li>• Goals must address relevant:               <ol style="list-style-type: none"> <li>1. Regulatory mechanism implementation</li> <li>2. Planning and structural BMP strategies</li> <li>3. New impervious surface reduction</li> <li>4. Discharge quality improvement</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li><u>BMPs:</u> Ordinance and Technical Standards Staff Training BMP Tracking Database Training for Construction Professionals Inspection and Enforcement Documentation</li> <li>• <b>Reduction percentages</b> <u>Tracking:</u> Review of Ordinance and Technical Standards Staff and Construction professionals attending training Development of a Post-Construction inspection and enforcement program, including procedures, forms, and tracking database</li> </ul>

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MCM	Rule 13 Language	Co-Permittee's Approach
<p>Pollution Prevention and Good Housekeeping</p> <p>15-13-17(c)</p>	<ul style="list-style-type: none"> <li>• Must identify specific reduction percentages <b>and</b> timetables</li> <li>• Goals must address relevant:               <ol style="list-style-type: none"> <li>1. Catch basin cleaning and street sweeping procedures</li> <li>2. Employee training</li> <li>3. Recycling program implementation</li> <li>4. Pesticide, fertilizer, and sand or salt usage reductions</li> <li>5. Floatables reduction</li> <li>6. Maintenance schedule for BMPs</li> </ol> </li> </ul>	<p><u>BMPs</u></p> <p>Annual IDDE, Good Housekeeping &amp; Pollution Prevention Staff Training MS4 Conveyance System Maintenance Maintenance Schedules Tracking Street Sweeping Program Canine Park Location Flood Management Projects Stormwater Pollution Prevention Plans</p> <ul style="list-style-type: none"> <li>• <b>Reduction percentages</b></li> </ul> <p><u>Tracking:</u></p> <p>Information collected from inspection reports (<i>disposal methods, amounts of materials used and disposed of, areas in good standing, etc.</i>)</p> <p>Tons of material removed from MS4 Conveyance System Tons of salt/sand utilized Spill prevention and clean up materials provided, utilized, and associated training BMPs implemented in maintenance area and wash area Quantities of fertilizer/pesticide utilized and OISC certified individuals Number of trainings held, staff attendance, and topic</p>

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**10.0**

**PROGRAM COSTS**

Rule 13 requires a summary of the current stormwater budget, expected or actual funding sources, and a projection of the budget for each year within the five (5) year permit term. Resources used for developing and implementing the stormwater program should be documented in order to demonstrate that monies, equipment, and staff are being and will be utilized for the program.

**10.1 PART C IMPLEMENTATION COSTS**

This section highlights the cost of implementing the program described in this document. The Morgan County Partnership for Water Quality collects approximately \$11,000 annually from the Co-Permittees. These funds are utilized for the collective efforts in implementing MCMs #1, #2, and #6. Further, the individual entities are responsible for the implementation of MCMs #3, #4, and #5 and varied funding amounts for each entity will be utilized from several sources such as general funds, municipal utility funds, and stormwater fees.

In addition to the costs associated with MCMs 1 through 6, there are numerous additional annual costs associated with implementing the Co-permittee's Stormwater Program. These costs are associated with completing reports, purchasing office supplies and equipment, and the general coordination of the Co-Permittees' Stormwater Program to ensure the program runs as efficiently as possible.

Actual expenditures are likely to vary between entities and vary with each year. The explanation of the stormwater programs and services listed in this section is intended to provide a broad-based overview of the Co-Permittees' program for each MCM and is not a comprehensive explanation of the Co-Permittees' Stormwater Program.

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**11.0**

**SUMMARY**

Implementation of the Co-Permittees Rule 13 required stormwater quality program will improve the overall quality of stormwater discharges entering into their separate storm sewer system. In order to successfully implement the Rule 13 program, the Co-Permittees must pay attention to reporting requirements contained in the programmatic indicators and adhere to the developed time lines.

**11.1 PROGRAMMATIC INDICATORS**

Programmatic Indicators are defined by IDEM as any data collected by an MS4 entity that is used to indicate implementation of one (1) or more minimum control measures. Programmatic Indicators pertain to specific environmental gauges that focus on the impacts of stormwater runoff. IDEM utilizes the Programmatic Indicators to determine the degree of success achieved by the Co-Permittees' stormwater management program. IDEM requires the identification of Programmatic Indicators and that they are grouped by corresponding MCM. IDEM further states that if an indicator is not applicable to the MS4 operator, then the operator shall provide rationale for the nonapplicability.

The Co-Permittees have addressed all indicators with the exception Programmatic Indicators 21 and 22. Currently, the Co-Permittees are not set up to track open space or impervious and pervious areas All other Programmatic Indicators have been addressed in the tables within previous sections detailing BMPs for each MCM.

**11.2 TIMELINE**

Information related to the timeline for the implementation of each BMP is included within the tables in previous sections outlining each MCM.

**11.3 NEXT STEPS**

As progress is made in implementing the Co-Permittees' Storm Water Quality Management Plan, elements contained in required annual program reports, monthly construction reports, and on-going water quality characterizations will need to be tracked. Rule 13 does provide program flexibility in that if a BMP proves to be ineffective or infeasible, then the Co-permittees may change their program and incorporate a different BMP.

**Annual Reports**

Beginning in the second permit term and going forward, MS4s are required to submit their Annual Reports in the 2<sup>nd</sup> and 4<sup>th</sup> years of the permit term. For the second permit term, the Co-permittee's Annual Reports will be due on October 15, 2010 and 2012. These Annual Reports must include information from the time the last Annual Report was submitted to the current reporting period. These reports must account for:

- Progress towards development, implementation, and enforcement of all MCMs, including updated programmatic indicator data;
- A summary of complaints received and follow-up investigation results related to stormwater quality issues;
- Updated measurable goals;

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- Stormwater BMPs installed or initiated;
- Follow-up or additional water quality characterization information;
- An updated active industrial facilities list;
- Implementation problems encountered, including BMP changes due to ineffectiveness or infeasibility;
- Funding sources and expenditures;
- Changes to MS4 area boundaries, including land areas added to the MS4 area via annexation or other similar means;
- Identified stormwater quality improvement projects; and
- Updated receiving water information.

### **Monthly Construction Site Activity Reports**

During previous permit term, monthly construction reports were required to be submitted to IDEM. Despite the submittal waiver, MS4s are still required to document any new permit applications that are received as well as any new notices of termination that are issued. At a minimum monthly documentation must include:

- A list of all construction and post-construction project site names;
- Project site addresses;
- Project site construction duration timeframes; and
- An indication of enforcement actions undertaken.

### **Agency Inspections**

To evaluate Rule 13 permit compliance, IDEM and/or IDNR staff may periodically inspect the Co-Permittees and audit their stormwater program. The MS4 Operator for the Co-Permittees should be prepared to answer questions and provide documentation of program elements. The point of contact for such inspections and audits will be the County Surveyor's Office. The Surveyor's Office may call upon responsible entities identified in the BMP tables for assistance in such inspections and audits. IDEM may request data to facilitate the identification or qualification of pollutants that may be released to the environment from an MS4 conveyance or to determine effectiveness of the MCMs.

### **On-going Water Quality Characterization**

As new water quality information becomes available and updates are made to data sources that were reviewed as part of the Co-Permittees' SWQMP – Part B: Baseline Water Quality Report, The Co-Permittees will review that information and adjust their Rule 13 program accordingly.

### **Rule 13 Permit Renewal**

Permit renewal applications are due at least sixty days prior to the expiration date for the Rule 13 permit. The Co-Permittees' renewal will be due in early September, 2013. Permit coverage under the renewal NOI will begin on the date of expiration from the previous five-year permit term. IDEM may reissue permits on a watershed basis, which may change these dates. Subsequent permits will require the Co-Permittees to maintain and, where possible, improve their performance in implementing the six MCMs.

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**Appendix A**

**REFERENCES**

Center for Watershed Protection. MCM Specific Guidance Documents. [www.cwp.org](http://www.cwp.org)

Christopher B. Burke Engineering, Ltd. NPDES Phase II General Permit Application, Stormwater Quality Management Plan, Part C: Program Implementation, Morgan County, Indiana. February 2005.

Indiana Department of Environmental Management. 327 IAC 15-13 Final Rule. August 2003.

Indiana Department of Environmental Management. Rule 13 Guidance Document. May 2003.

U.S. EPA – Office of Water. Stormwater Phase II Compliance Assistance Guide. March 2000.

U.S. EPA – Office of Water, Stormwater Phase II Final Rule. January 2000.

U.S. EPA – Office of Water, MS4 Program Evaluation Guidance. January 2007.

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**Appendix B**

**ACRONYMS**

<b>BMP</b>	Best Management Practice
<b>CBBEL</b>	Christopher B. Burke Engineering, Ltd.
<b>CWA</b>	Clean Water Act
<b>EPA</b>	Environmental Protection Agency
<b>GIS</b>	Geographical Information System
<b>GPS</b>	Global Positioning System
<b>IDDE</b>	Illicit Discharge Detection and Elimination
<b>IDEM</b>	Indiana Department of Environmental Management
<b>IDNR</b>	Indiana Department of Natural Resources
<b>MCM</b>	Minimum Control Measure
<b>MS4</b>	Municipal Separate Storm Sewers
<b>NOI</b>	Notice of Intent
<b>NPDES</b>	National Pollution Discharge Elimination System
<b>SWCD</b>	Soil and Water Conservation District
<b>SWMD</b>	Solid Waste Management District
<b>SWQMP</b>	Storm Water Quality Management Plan

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**Appendix C**

**LISTING OF ACTIVE INDUSTRIAL FACILITIES –  
INDIANA CHAMBER OF COMMERCE**

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**Appendix D LISTING OF ACTIVE INDUSTRIAL FACILITIES –  
MOORESVILLE STORMWATER DEPARTMENT**

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