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

Best Management Practice (BMP)	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Priority Areas	Responsible Party
<p align="center">Stormwater System Map</p>	<ul style="list-style-type: none"> • Map 25% of the conveyance system between 2005 and 2008 in conjunction with screening efforts. • Track using Programmatic Indicators #5 and #6. 	<ul style="list-style-type: none"> • Begin March 2005, then on-going. • 25% complete end of 2005 • 50% complete end of 2006 • 75% complete end of 2007 • 100% complete end of 2008 	<ul style="list-style-type: none"> • Map all main trunk lines of conveyances with 12" and larger diameter and open conveyances with a 2' and larger bottom width. • Begin mapping activities in priority watershed areas: <ol style="list-style-type: none"> 1. Cedar Creek-Cedar Canyons 2. Maumee River-Bullerman Ditch 3. Maumee River-River Haven 4. Maumee River Sixmile Creek 5. Willow Creek-Willow Creek Ditch 6. St. Mary's River-Spy Run Creek 7. St. Mary's River-Snyder Ditch 8. Becketts Run 9. St. Joseph River-Ely Run 10. St. Joseph River-Tiernan Ditch 11. St. Joseph River-Cedarville Reservoir 12. Aboite Creek-Big Indian/Little Indian Creeks 13. Wilbur Ditch-Bottern Ditch 14. St. Joseph River-Schoppman Drain 	<p>Surveyor's Office.</p>

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Best Management Practice (BMP)	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Priority Areas	Responsible Party
<p>Illicit Discharge Detection and Elimination (IDDE) Ordinance.</p>	<p>Adopt Stormwater Management Ordinance by March 30, 2005.</p>	<p>Implementation beginning March 30, 2005.</p>	<p>Countywide.</p>	<p>Surveyor's Office.</p>
<p>IDDE Plan</p>	<ul style="list-style-type: none"> • Identify and eliminate illicit storm sewer connections. • Enhance existing Health Department die screening program. • Check 25% of the conveyance system for years 2-5 of the permit in conjunction with mapping and screening efforts. • Update program priorities annually. • Track using Programmatic Indicators #7, #8, and #9. 	<p>Implementation beginning March 2005, then updated annually.</p>	<ul style="list-style-type: none"> • Begin in and work through 14-digit watersheds areas that have E. coli listings in 305(b) or 303(d) reports. • Prioritize outfalls checked for further, detailed follow up investigations. 	<p>Surveyor's Office.</p>
<p>Citizen Complaints</p>	<ul style="list-style-type: none"> • Listen and respond to citizen complaints. • Take appropriate follow up actions. • Document citizen reports and responses in ASIST database. • Track using Programmatic Indicators #2 and #3. 	<p>On-going.</p>	<p>Countywide.</p>	<p>ACPWQ and Surveyor's Office.</p>

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Best Management Practice (BMP)	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Priority Areas	Responsible Party
Storm Drain Marking	<ul style="list-style-type: none"> • Develop and implement program by November 2005. • Track using Programmatic Indicators #3 and #4. 	Begin 2005, then on-going.	Countywide as volunteers are found.	ACPWQ and Surveyor's Office.
Solid Waste Management District Promotions	<ul style="list-style-type: none"> • Promote activities of the ACSWMD as a means to educate community members on the importance of pollution prevention and available recycling programs, as these activities occur. • Track using Programmatic Indicators #10, #11, and #12. 	Begin 2005, then on-going.	Countywide.	SWMD, ACPWQ, and Surveyor's Office.
Annual IDDE, Good Housekeeping, & Pollution Prevention Staff Training	<ul style="list-style-type: none"> • Develop training program and conduct one in 2005. • Conduct annual refresher training. • Track using Programmatic Indicator #2. 	Begin in 2005, then annual updates.	Focus on MS4 conveyance system, MS4 operational areas, and Highway Department Facilities.	Outsourced.

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**6.0 MINIMUM CONTROL MEASURE #4
CONSTRUCTION SITE STORM WATER 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 to the local SWCD to provide comments and recommendations to the MS4 operator on individual projects.

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.

6.1 EXISTING CONSTRUCTION SITE STORMWATER RUNOFF CONTROL BMPs

Compliance with MCM #4 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. In Allen County, stormwater runoff controls for all construction activities are currently regulated under the Allen County Drainage and Sediment Control Ordinance. In the Town of Huntertown and Town of Leo-Cedarville, stormwater runoff controls for all construction activities are currently regulated via the Allen County's Drainage and Sediment Control Ordinance. Additionally, Allen County relies on the SWCD and the IDNR Division of Soil Conservation for implementation of Indiana's Rule 5 program for minimizing stormwater runoff from construction activities.

Existing local Construction Site Runoff Control activities implemented by Allen County are as follows:

- The Allen County Drainage and Sediment Control Ordinance contains enforcement language relating to runoff control, but not for site inspections. The ordinance states that all erosion control measures required by the ordinance shall meet the design criteria, standards, and specifications for erosion control

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measures outlined in “Indiana Handbook for Erosion Control in Developing Areas, Guidelines for Protecting Water Quality Through the Control of Soil Erosion and Sedimentation on Construction Sites”, published by the Division of Soil Conservation, IDNR (October, 1992). If the requirements of the ordinance are not met, no building permit will be issued.

- The Allen County Surveyor’s Office conducts plan review items regarding new construction, including plat reviews, detention requirements, construction plans, and permit applications.
- The SWCD reviews and approves erosion and sediment control plans according to Rule 5 requirements (sites disturbing 5 acres or more of land) for Allen County.
- The Complaint Section of the Allen County Surveyor’s Office handles complaints received by the general public. A representative follows up with the complaint by performing a site visit and assessing the issue. The Surveyor’s Office handles the complaint if it pertains to agricultural drainage issues or water quantity issues within subdivisions. If the complaint relates to erosion control within subdivisions, then the complaint is redirected to the NRCS, which has enforcement capabilities through the issuance of fines.

Existing local Construction Site Runoff Control activities implemented by Hometown are as follows:

- All plan reviews for the Town are conducted by the Allen County Plan Commission.
- All new construction plans are submitted to the Allen County Surveyor’s Office, which conducts plan review items regarding new construction, including plat reviews, detention requirements, construction plans, and permit applications.
- Inspection of sites is performed at the recommendation of the Allen County Surveyor’s Office or through citizen complaints.

Existing local Construction Site Runoff Control activities implemented by Leo-Cedarville are as follows:

- All new construction plans are submitted to the Allen County Surveyor’s Office, which conducts plan review items regarding new construction, including plat reviews, detention requirements, construction plans, and permit applications.
- All street projects are submitted to the Allen County Highway Department for review.

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- Citizen complaints regarding construction activities are handled by the Clerk Treasurer or Town Council. The Town Council reviews the complaint and directs it toward the Town Engineer or Allen County Surveyor's Office.

The existing Construction Site Stormwater Control activities discussed above will help ensure the County's compliance with requirements of Rule 13. However, these activities are currently not sufficient to address the requirements of Rule 13.

6.2 PROPOSED CONSTRUCTION SITE STORMWATER RUNOFF CONTROL BMPs

The following Construction Site Stormwater Runoff Control BMPs will be developed and implemented by Allen County in order to comply with the minimum requirements of MCM #4. Existing BMPs identified in subsection 6.1 with any needed enhancements, as well as, any new BMPs are included in this section. The County's stormwater ordinance will be implemented on a county-wide basis.

As of March 2005, Allen County has initiated the implementation of a Construction Site Stormwater Runoff Control Program as part of this Part C Plan, which outlines the overall strategy for gradually implementing the program and its corresponding BMPs over the next four years. The County's program is designed to minimize the amount of sediment and other pollutants from being discharged from construction sites. The presumptive approach of implementing this program assumes that these pollutants will be reduced each year.

Table 6-1 provides a summary of the Construction Site, stormwater quality BMPs to be implemented and identifies the associated measurable goals, programmatic indicators, tracking, timeline, priority areas, and responsible parties associated with each BMP. Detailed description of each BMP is provided below.

Erosion and Sediment Control Ordinance

To minimize water quality impacts of development occurring within Allen County and ensure that new and redevelopment within the County's MS4 area is managed as efficiently as possible, the County is in the process of updating their existing Storm Drainage, and Erosion and Sediment Control Ordinance (SDESCO) into a comprehensive, Stormwater Management Ordinance to meet the minimum requirements of 327 IAC 15-5 (Rule 5). Adoption of the Ordinance is anticipated at the March 30, 2005 public meeting of the County Commissioners. This updated ordinance will be administered and enforced through the County Surveyor's Office. This ordinance addresses illicit discharges, construction runoff, and post-construction runoff. The County will review the Stormwater Management Ordinance annually to ensure it meets the minimum requirements of Rule 5. The County's comprehensive Stormwater Management Ordinance is a supplemental document that is bound separately from this report. Any activities towards revising the ordinance will be documented in the County's Rule 13 Annual Reports submitted to IDEM.

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Plan Review, Site Inspection, and Enforcement

The County Surveyor's Office will hire new staff or outsource services to conduct Erosion and Sediment Control plan reviews, construction site inspections, and if necessary to refer sites for enforcement actions. A copy of each development plan will be sent to the SWCD for review as well. The Surveyor's Office will perform construction site inspections and, if necessary, refer sites for enforcement actions. This will ensure that construction plans are being implemented properly and that sites are in compliance with the County's ordinance. Activities will be prioritized in accordance with the County's "Procedure for Prioritizing Construction Program Activities" (described on the next page). Beginning March 2005, review 100% of construction plans and inspect 100% of sites once and 50% of sites twice. Construction site operator compliance improvement will be documented via requested plan revisions made, corrections made in response to inspection reports and forms requests, and enforcement action required corrections. Enforcement actions include requiring corrective actions, fines, and/or stop work orders. Activities will be documented as part of the Monthly Construction Site Project Summary submitted to IDEM as described in Section 10.3.

Staff Training

The County Surveyor's office will hire new staff or outsource services and conduct annual staff trainings for new and existing staff. The County will ensure that an adequate amount and skill level of staffing is in place or services can be outsourced to account for increased workloads associated with performing erosion and sediment control plan review, inspection, and enforcement as mandated by Rule 13. All County staff or hired consultants involved in plan review and site inspection activities will be trained. Training program content will include information on construction and post-construction BMPs and priority watershed concerns. Current staff and/or new staff, or hired consultants, responsible for construction site plan review and construction site inspections will receive, at a minimum, annual erosion and sediment control training. All training activities including the specific curriculum, as well as the number of staff trained, will be included in the County's Rule 13 Annual Reports submitted to IDEM. Staff and/or outsourced services contracts will be in place and trained by March 2005.

Erosion and Sediment Control and Post-Construction BMP Tracking Database

The County Surveyor's Office will use the County's ASIST database to track the status of construction projects, Erosion and Sediment Control activities, and post-construction BMPs. The database will ensure efficient management and accurate reporting on the status of development within Allen County. The database will be utilized to track and document Erosion and Sediment Control violations, community complaints, public informational requests, and location of sites in relation to priority watershed areas identified in subsection 2.3. The database will therefore serve as an aid to inspection staff for follow-up inspections and, if necessary, enforcement actions. The database will be implemented in March of 2005. The County Surveyor's Office will submit reports from the database to the IDEM monthly. All activities associated with the database will be summarized and included in the County's Rule 13 Annual Reports submitted to IDEM.

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Training for Construction Professionals

The County Surveyor's Office will administer a local construction and development community education program, which will increase the construction and development community's awareness of changing erosion and sediment control standards. The training will include annual erosion and sediment control BMP training workshops (the first starting in 2005), which focus on the County's erosion and sediment control program, construction and post-construction stormwater BMPs, special protective measures needed within the County's identified priority watersheds and sensitive areas, and dealing with highly erodible soils. IDEM and IDNR will be consulted on program content. As applicable trainings are offered by other entities, such as, IDNR, the Surveyor's office will promote these activities to construction professionals. Educating construction professionals about the proper selection, installation, inspection, and maintenance of BMPs will help to ensure compliance with the County's erosion and sediment control requirements contained in their ordinance. Information on training activities conducted will be included in the County's Rule 13 Annual Reports submitted to IDEM.

Procedure for Prioritizing Construction Activities

The County will prioritize construction activities for the inspection and enforcement process to ensure that construction and development site inspections are as effective as possible. For each project site, County staff will evaluate the nature and extent of the construction activity, topography, highly erodible soils, soil suitability for septic systems, and priority watersheds (as well as their receiving waters) as described in Part B to determine how frequently these sites need to be inspected. Sites great than or equal to 5 acres in size, located near a receiving water, as well as sites containing slopes greater than or equal to 4%, wetlands, and/or endangered, threatened, or rare species will likely be prioritized for more frequent inspections. As the County's construction program develops, the County will periodically evaluate their priorities for construction activities. Updates to County procedures will be submitted in the County's Rule 13 Annual Reports.

Inspection and Enforcement Documentation

The County will use IDNR's existing inspection and enforcement form for their Erosion and Sediment Control inspectors to complete following each site inspection to ensure that County procedures are consistent with State's Rule 5 program. County inspectors will be required to document Erosion and sediment control BMP adequacies and inadequacies identified during each visit. All construction site managers will be given a copy of the form following each inspection and be required to sign suggesting their understanding and willingness to address any BMP inadequacies identified. If follow-up inspections prove that the identified BMP inadequacies were not addressed, the form will identify enforcement measures to be taken by the County. Information from completed forms will be entered into the County's ASIST database.

Quality Assurance/Quality Control (QA/QC) of overall program

In order to ensure consistency with the State's Rule 5 program and maintain overall

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program quality, the County will comply with Rule 5 on County owned and operated projects. In March 2005, the County will work with IDEM & IDNR to seek approval for program and to review County owned and operated projects. The County will request meetings with the agencies to review the County's program at least annually. The County will track the number of County projects subject to Rule 5, the number of IDNR and IDEM meetings, and information discussed in meetings. This action will correct program deficiencies or make updates based on new information or technology.

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**Table 6-1
Construction Site Stormwater Runoff Control BMPs**

Best Management Practice (BMP)	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Priority Areas	Responsible Party
Erosion and Sediment Control Ordinance	<ul style="list-style-type: none"> • Adopt Comprehensive Stormwater Management Ordinance by March 30, 2005. • Track permits issued using Programmatic Indicator #13. 	Implementation beginning March 30, 2005.	Countywide.	Surveyor's Office.
Plan Review, Site Inspection, and Enforcement	<ul style="list-style-type: none"> • Review 100% of construction plans and inspect 100% of sites once and 50% of sites twice, beginning March 2005. • Hire and train staff by March 2005. • Conduct annual staff trainings. 	Beginning March 2005, then on-going.	Use written Procedure for Prioritizing Construction Program Activities.	Surveyor's Office and outsourced.
Staff Training	<ul style="list-style-type: none"> • Implement tracking system by March 2005. • Send reports to IDEM monthly. • Track using Programmatic Indicators #13, #14, #15, #16, #17, #18, #20, and #21. 	First training of all staff by March 2005, then annually.	Include training on erosion and sediment control, post-construction BMPs, priority watersheds, and sensitive areas.	Surveyor's Office and outsourced.
Erosion and Sediment Control and Post-Construction BMP Tracking Database	<ul style="list-style-type: none"> • Administer a local construction and development community education program. • Conduct first workshop in 2005, then annually. • Promote other activities, such as regional IDNR 	<ul style="list-style-type: none"> • Begin tracking March 2005, then on-going. • Monthly reports to IDEM. 	Countywide.	Surveyor's Office and outsourced.
Training for Construction Professionals		<ul style="list-style-type: none"> • Offer first workshop in 2005, then annually. • On-going, promote other applicable training opportunities. 	Include training on erosion and sediment control, post-construction BMPs, priority watersheds, and sensitive areas.	Surveyor's Office and outsourced.

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Best Management Practice (BMP)	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Priority Areas	Responsible Party
	trainings. <ul style="list-style-type: none"> Track using Programmatic Indicator #2. 			
Procedure for Prioritizing Construction Activities	<ul style="list-style-type: none"> Implement procedure by March 30, 2005. Track using Programmatic Indicator #15. 	Begin March 30, 2005.	Use written Procedure for Prioritizing Construction Program Activities.	Surveyor's Office and outsourced.
Inspection and Enforcement Documentation	<ul style="list-style-type: none"> Complete IDNR forms as part of on-going program. Enter information into ASIST. 	Start in 2005, then on-going.	Use written Procedure for Prioritizing Construction Program Activities.	Surveyor's Office and outsourced.
QA/QC of Overall Program	<ul style="list-style-type: none"> Comply with Rule 5 on County owned and operated projects. In March 2005, work with IDEM & IDNR to seek approval for program and to review County owned and operated projects. Review with agencies at least annually. 	First in March 2005, then annually.	Ensure that projects are meeting goals for written Procedure for Prioritizing Construction Program Activities.	Surveyor's Office and outsourced.

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**7.0 MINIMUM CONTROL MEASURE #5
POST-CONSTRUCTION STORM WATER 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 storm water 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 storm water 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.

7.1 EXISTING POST-CONSTRUCTION SITE STORMWATER RUNOFF CONTROL BMPs

Compliance with MCM #5 requires MS4s to develop a program for managing post-construction 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 stormwater quality is maintained from the developed site via an enforceable ordinance or other regulatory mechanism.

Existing Post-Construction Site Stormwater Runoff Control activities implemented by Allen County are as follows:

- The Allen County Surveyor's Office requires the following structural controls for post construction runoff:
 - excavated excess spoil from detention basins shall have a slope no steeper than 4:1 for safety, erosion control, stability, and ease of maintenance
 - grass or other suitable vegetative cover shall be provided throughout the entire detention storage basin area
 - safety ledge and maintenance ledge required for wet-bottom basins
 - for detention ponds with a normal pool greater than 3.0 acres, material such as stone, riprap, or other material/planting is required to prevent erosion due to wave action
 - periodic maintenance is required in lakes to control weeds
 - debris removal from stormwater detention basins is required
 - if required, aeration facilities to prevent pond stagnation should be provided

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- open channels side slopes shall be no steeper than 3:1 and flatter slopes may be required to prevent erosion and ease of maintenance
- channel stability inspection of open channels created to convey stormwater runoff is required after construction is complete
- The Allen County Surveyor's Office has established guidelines for managing files pertaining to the County's stormwater management program. Data sets including design plans, reports, previously approved projects, and as-builts. All files are kept on-site and indefinitely in hard copy format. The ACSO also maintains the Rule 5 plans, applications, and correspondence. These too are kept on-site in hard copy format indefinitely.
- The Allen County Surveyor's Office requires a permanent erosion control plan of all graded and non-hard surface areas within the proposed development, as planned for completion.
- The Allen County Surveyor's Office requires maintenance procedures by responsible parties to keep all of the land under adequate cover and erosion at an acceptable minimum.
- The Allen County Surveyor's Office requires as-built plans, which include storm drainage and erosion control systems, before final acceptance of the proposed project.
- The County maintains a MicroStation GIS database. The Allen County Surveyor's Office uses ArcView for its GIS data, which contains descriptions of known BMPs in the St. Joseph Watershed.

Existing Post-Construction Site Stormwater Runoff Control activities implemented by Leo-Cedarville are as follows:

- The Town requires as-built drawings to be submitted once the project has been constructed.

The existing Post-Construction Stormwater Runoff Control activities discussed above will help ensure the County's compliance with requirements of Rule 13. However, these activities are currently not sufficient to address the requirements of Rule 13.

7.2 PROPOSED POST-CONSTRUCTION SITE STORMWATER RUNOFF CONTROL BMPs

The following Post-Construction Site Stormwater Runoff Control BMPs will be developed and implemented by Allen County in order to comply with the minimum requirements of MCM #5. Existing BMPs identified in subsection 7.1 with any needed enhancements, as well as, any new BMPs are included in this section. The County's

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ordinance will be implemented on a countywide basis.

As of March 2005, Allen County has initiated the implementation of a Post-Construction Site Stormwater Runoff Control Program as part of this Part C Plan, which outlines the overall strategy for gradually implementing the program and its corresponding BMPs over the next four years. The County's program is designed to ensure adequate stormwater quality is maintained from developed sites. The presumptive approach of implementing this program assumes that overall stormwater quality will improve each year. The technological standards required as part of the County's ordinance contains specific reduction goal percentages for each BMP.

Table 7-2 provides a summary of the Post-Construction Site Runoff BMPs to be implemented and identifies the associated measurable goals, programmatic indicators, tracking, timeline, priority areas, and responsible parties associated with each BMP. Detailed description of each BMP is provided below.

Post-Construction Control Ordinance

The County is in the adoption process of a comprehensive, county-wide ordinance that meets the minimum requirements of 327 IAC 15-13 (Rule 13) by including post-construction site runoff control measures. The post-construction provisions are part of a comprehensive, Stormwater Management Ordinance that addresses illicit discharges, construction runoff, and post-construction runoff. Adoption of the Ordinance is anticipated at the March 30, 2005 public meeting of the County Commissioners. The post-construction provisions will minimize the water quality impacts from new development within Allen County and ensure that new/redevelopment within the County's MS4 area is managed as efficiently as possible. The ordinance will be administered and enforced through the County Surveyor's Office. The County will review the ordinance annually to ensure it meets the minimum requirements of Rule 5. The County's comprehensive Stormwater Management Ordinance is a supplemental document that is bound separately from this report.

Post-construction BMPs continue to treat stormwater after construction has been completed and the site has been stabilized. Installing certain BMPs, such as bioretention areas and sand filters, prior to stabilization can cause failure of the measure due to clogging from sediment. If such BMPs are installed prior to site stabilization, Allen County will require that they will be protected by traditional erosion control measures.

Conversely, detention ponds and other BMPs can be installed during construction and used as sediment control measures. In those instances, Allen County will require that the construction sequence ensures the pond is cleaned out with pertinent elevations and storage and treatment capacities reestablished as noted in the accepted stormwater management plan.

Allen County has adopted a policy that the control of stormwater runoff quality will be based on the management of Total Suspended Solids (TSS). This requirement is being

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adopted as the basis of Allen County's stormwater quality management program for all areas of jurisdiction.

Allen County has designated 12 pre-approved BMP methods to be used alone or in combination to achieve the 80% TSS removal stormwater quality goals for a given project. These BMP measures are listed along with their anticipated average TSS removal rates in **Table 7-1**. Pre-approved BMPs have been proven/are assumed to achieve the average TSS removal rates indicated in Table 7-1. Anyone applying for a County permit desiring to use a different TSS removal rate for these BMPs must follow the requirements discussed in the County's Technical Standards Document for Innovative BMPs. Details regarding the applicability and design of these pre-approved BMPs are contained within fact sheets presented in Appendix D of the County's Technical Standards Document.

Note that a single BMP measure may not be adequate to achieve the water quality goals for a project. It is for this reason that a "treatment train", a number of BMPs in series, is often required for a project.

**TABLE 7-1
Pre-approved Post-construction BMPs**

BMP Description	Anticipated Average % TSS Removal Rate ^E
Bioretention ^A	75
Constructed Wetland	65
Underground detention	70
Extended Dry Detention ^B	72
Infiltration Basin ^A	87
Infiltration Trench ^A	87
Media Filtration – Underground Sand	80
Media Filtration – Surface Sand	83
Storm Drain Insert ^D	NA ^C
Filter Strip	48
Vegetated Swale	60
Wet Detention	80

Notes:

- A. Based on capture of 0.5-inch of runoff volume as best available data. Effectiveness directly related to captured runoff volume, increasing with larger capture volumes.
- B. Test results are for three types of ponds: extended wet detention, wet pond and extended dry detention

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- C. NA may indicate that the BMP is not applicable for the pollutant, but may also indicate that the information is simply Not Available. Independent testing should be provided, rather than the manufacturer's testing data.
- D. Must provide vendor data for removal rates.
- E. Removal rates shown are based on typical results. These rates are also dependent on proper installation and maintenance. The ultimate responsibility for determining whether additional measures must be taken to meet the Ordinance requirements for site-specific conditions rests with the applicant.

Allen County has established minimum standards for the selection and design of construction water quality BMPs in their Technical Standards document. The information provided establishes performance criteria for stormwater quality management and procedures to be followed when preparing a BMP plan for compliance. Post-Construction BMPs must be sized to treat the water quality volume, WQv, for detention-based BMPs or the water quality discharge, Qwq, for flow-through BMPs. The Technical Standards Document provides the methodology for calculating the WQv and Qwq values.

BMPs not previously accepted by Allen County must be certified by a professional engineer licensed in State of Indiana and accepted through Allen County. American Society for Testing and Materials (ASTM) standard methods must be followed when verifying performance of new measures. New BMPs, individually or in combination, must meet the 80% TSS removal rate at 50-125 micron range (silt/fine sand) without reentrainment and must have a low to medium maintenance requirement to be considered by Allen County. Testing to establish the TSS removal rate must be conducted by an independent testing facility, not the BMP manufacturer.

Plan Review, Site Inspection, and Enforcement

The County Surveyor's Office will hire new staff or outsource services to conduct post-construction BMP plan reviews in conjunction with Erosion and Sediment Control plan reviews, post-construction BMP inspections in conjunction with construction site inspections, and if necessary to refer sites for enforcement actions. Plans will be reviewed to ensure compliance with the technological standards required as part of the County's ordinance containing specific reduction goal percentages for each BMP. A copy of each development plan will be sent to the SWCD for review as well. The Surveyor's Office will perform construction site inspections and, if necessary, refer sites for enforcement actions. This will ensure that post-construction BMP plans are being implemented properly and that sites and BMPs are in compliance with the County's ordinance. Activities will be prioritized in accordance with the County's "Procedure for Prioritizing Construction Program Activities". Beginning March 2005, review 100% of construction and post-construction plans and inspect 100% of sites once and 50% of sites twice. Construction site operator compliance improvement will be documented via requested plan revisions made, corrections made in response to inspection reports and forms requests, and enforcement action required corrections. Enforcement actions include requiring corrective actions, fines, and/or stop work orders. Activities will be documented as part of the Monthly Construction Site Project Summary submitted to

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IDEM as described in Section 10.3.

Staff Training

The County will hire new staff or outsource services and conduct annual staff trainings for new and existing staff. The County will ensure that an adequate amount and skill level of staffing is in place or services can be outsourced to account for increased workloads associated with performing Erosion and Sediment Control plan review, inspection, and enforcement as mandated by Rule 13. All County staff and hired consultants involved in plan review and site inspection activities will be trained in accordance with the County's ordinance. Training program content will include information on construction and post-construction BMPs and priority watershed concerns. Current staff and/or new staff, or hired consultants responsible for construction site plan review and construction site inspections will receive, at a minimum, annual post-construction BMP training. Staff/outsourced service contracts will be in place and trained by March 2005. The County will track number of construction sites inspected.

Inspection and Enforcement Documentation

The County will use the inspection and enforcement forms from their Technical Standards Manual in conjunction with the exiting IDNR form for Erosion and Sediment Control and Post-construction BMP inspectors to complete following each site inspection. County inspectors will be required to document Erosion and Sediment Control and Post-construction BMP adequacies and inadequacies identified during each visit. All construction site managers will be given a copy of the form(s) following each inspection and be required to sign suggesting their understanding and willingness to address any BMP inadequacies identified. If follow-up inspections prove that the identified BMP inadequacies were not addressed, the form will identify enforcement measures to be taken by the County. Information from completed forms will be entered into the County's ASIST database.

Post-construction BMP Operation and Maintenance Plan

Currently, the County does not own or operate any stormwater quality BMPs. If the County has need of this in the future then, the County will develop and implement an Operation and Maintenance (O&M) Plan for County owned post-construction BMPs to ensure long-term effectiveness and adequacy of newly installed BMPs.

Erosion and Sediment Control and Post-Construction BMP Tracking Database

The County Surveyor's Office will use the County's ASIST database to track the status of construction projects, Erosion and Sediment Control activities, and post-construction BMPs. The database will ensure efficient management and accurate reporting on the status of development within Allen County. The database will be utilized to track and document Erosion and Sediment Control violations, community complaints, public informational requests, and location of sites in relation to priority watershed areas identified in subsection 2.3. The database will therefore serve as an aid to inspection staff for follow-up inspections and, if necessary, enforcement actions. The database will be implemented in March of 2005. The County Surveyor's Office will submit reports

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from the database to the IDEM monthly. All activities associated with the database will be summarized and included in the County's Rule 13 Annual Reports submitted to IDEM.

Training for Construction Professionals

The County Surveyor's office will administer a local construction and development community education program, which will increase the construction and development community's awareness of changing erosion and sediment control standards. The training will include annual erosion and sediment control BMP training Workshops (the first starting in 2005), which focus on the County's erosion and sediment control program, construction and post-construction stormwater BMPs, special protective measures needed within the County's identified priority watersheds and sensitive areas, and dealing with highly erodible soils. IDEM and IDNR will be consulted on program content. As applicable trainings are offered by other entities, such as, IDNR, the Surveyor's office will promote these activities to construction professionals. Educating construction professionals about the proper selection, installation, inspection, and maintenance of BMPs will help to ensure compliance with the County's erosion and sediment control requirements contained in their ordinance. Information on training activities conducted will be included in the County's Rule 13 Annual Reports.

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**Table 7-2
Post-construction Site Stormwater Runoff Control BMPs**

Best Management Practice (BMP)	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Priority Areas	Responsible Party
Post-Construction Control Ordinance	<ul style="list-style-type: none"> • Adopt Comprehensive Stormwater Management Ordinance by March 30, 2005. • Review construction and post-construction plans as part of MCM #4. • Track permits issued using Programmatic Indicator #13. 	Implementation beginning March 30, 2005.	Countywide.	Surveyor's Office.
Plan Review, Site Inspection, and Enforcement	Review 100% of construction plans and inspect 100% of sites once and 50% of sites twice, beginning March 2005.	Beginning March 2005, then on-going.	Use written Procedure for Prioritizing Construction Program Activities.	Surveyor's Office and outsourced.
Staff Training	<ul style="list-style-type: none"> • Hire and train staff by March 2005. • Conduct annual staff trainings. 	First training of all staff by March 2005, then annually.	Include training on erosion and sediment control, post-construction BMPs, priority watersheds, and sensitive areas.	Surveyor's Office and outsourced.
Inspection and Enforcement Documentation	<ul style="list-style-type: none"> • Complete forms as part of on-going program. • Enter information into ASIST database. 	Start in 2005, then on-going.	Use written Procedure for Prioritizing Construction Program Activities.	Surveyor's Office and outsourced.
Post-construction BMP Operation and Maintenance (O&M) Plan	<ul style="list-style-type: none"> • If necessary, develop Post-construction BMP O&M Plan. • Track using Programmatic Indicator #19. 	If situation arises.	County owned & operated structural stormwater quality BMPs.	Surveyor's Office and outsourced.

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Best Management Practice (BMP)	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Priority Areas	Responsible Party
<p>Erosion and Sediment Control and Post-Construction BMP Tracking Database</p>	<ul style="list-style-type: none"> • Implement tracking system by March 2005. • Send reports to IDEM monthly. • Track using Programmatic Indicators #13, #14, #15, #16, #17, #18, #20, and #21. 	<ul style="list-style-type: none"> • Begin tracking March 2005, then on-going. • Monthly reports to IDEM. 	<p>Countywide.</p>	<p>Surveyor's Office and outsourced.</p>
<p>Training for Construction Professionals</p>	<ul style="list-style-type: none"> • Administer a local construction and development community education program. • Conduct first workshop in 2005, then annually. • Promote other activities, such as regional IDNR trainings. • Track using Programmatic Indicator #2. 	<ul style="list-style-type: none"> • Offer first workshop in 2005, then annually. • On-going, promote other applicable training opportunities. 	<p>Include training on erosion and sediment control, post-construction BMPs, priority watersheds, and sensitive areas.</p>	<p>Surveyor's Office and outsourced.</p>

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**8.0 MINIMUM CONTROL MEASURE #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, fertilizer and pesticide application, and the function of BMPs. Such training must be documented in writing.

8.1 EXISTING POLLUTION PREVENTION AND GOOD HOUSEKEEPING BMPs

Compliance with MCM #6 requires MS4s to develop and implement a program to prevent or reduce pollutant runoff from municipal operations within the MS4 area. Allen County and the Town of Hometown are currently implementing a number of recommended Stormwater Pollution Prevention BMPs. The Town of Leo-Cedarville does not own any municipal operation facilities at this time.

Existing Pollution Prevention and Good Housekeeping BMPs implemented by Allen County are as follows:

- The Allen County Parks Department has an in-service employee training for chemical handling.
- The Allen County Highway Department maintains three (3) barns for road salt storage.
- The Highway Department employees attend annual training on the handling and application of herbicides utilized in roadside spraying.
- The Highway Department notifies the Allen County Emergency Agency regarding any roadside spills.
- The Highway Department submits a Rule 5 plan to the Allen County Surveyor's Office and SWCD for all road projects.

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Existing Pollution Prevention and Good Housekeeping BMPs implemented by the Town of Hometown are as follows:

- The Town's Street Department performs vehicle wash downs at a privately owned car wash facility.
- The Street Department purchases salt from the Allen County Highway Department and has barns for salt storage.

The existing Pollution Prevention and Good Housekeeping activities discussed above will help ensure the County's compliance with requirements of Rule 13. However, these activities are currently not sufficient to address the requirements of Rule 13.

8.2 PROPOSED POLLUTION PREVENTION AND GOOD HOUSEKEEPING BMPs

The following Pollution Prevention and Good Housekeeping BMPs will be developed and implemented by Allen County in order to comply with the minimum requirements of MCM #6. Existing BMPs identified in subsection 8.1 with any needed enhancements, as well as, any new BMPs are included in this section.

As of March 2005, Allen County has initiated the implementation of a Pollution Prevention and Good Housekeeping Program as part of this Part C Plan, which outlines the overall strategy for gradually implementing the program and its corresponding BMPs over the next four years. The County's program is designed to address the quality of stormwater discharges from County activities to their MS4 conveyance system. The presumptive approach of implementing this program assumes that overall stormwater quality will improve each year by reducing the amounts of pollutants entering the conveyance system. Reduction goal percentages will be correlated to amounts of BMPs installed, amounts of material collected from BMPs, and plans implemented. For example, 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 8-2 provides a summary of the Pollution Prevention and Good Housekeeping BMPs to be implemented and identifies the associated measurable goals, programmatic indicators, tracking, timeline, priority areas, and responsible parties associated with each BMP. Detailed description of each BMP is provided below.

MS4 Conveyance System Maintenance

Beginning in 2005, the County will begin a program designed to inspect and maintain the County's MS4 conveyance system. Regular maintenance allows the conveyance system to work efficiently and removes pollutants. The County will only focus upon those portions of the conveyance system with twelve-inch pipes or ditches with two-foot

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bottom widths. The program will focus on stabilizing unvegetated portions of the County's conveyance system (ditches, swales and road side shoulders) since unvegetated areas can produce erosion and sediment pollution, as well as repairing and cleaning catch basins, trash racks and other structural components of the County's conveyance system. Currently the County has a hydroseeder that is used for stabilization. Inspection and maintenance activities will be performed by staff from the County Surveyor's office and/or the County Highway Department. The County intends to inspect the entire system within the County's MS4 area in the first permit term. Maintenance needs will be prioritized and improvement needs will be conducted as funding allows.

All inspection staff will receive annual training on proper inspection and maintenance techniques. The county will document, in the County's ASIST database, the estimated or actual linear feet of the County's conveyance system that is cleaned, repaired and or vegetated as well as the specific locations at which these activities are conducted. In addition, the County will estimate the amount of material collected from catch basins, trash racks and other structural BMPs. County staff will also be trained on the County's SWQMP tracking requirements to ensure all activities associated with conveyance system inspections and maintenance are documented. The County will document all activities associated with conveyance system maintenance. This information will be included in the County's Rule 13 Annual Reports submitted to IDEM. **Table 8-1** outlines the County's MS4 conveyance system maintenance activities.

**Table 8-1
Storm Sewer System Maintenance Scheduled Activities**

Activity	Schedule for Performing Activity
A. Periodic Litter Pickup	County staff will annually conduct litter pickup events along major thoroughfares, at stormwater outfalls, and other areas to be prioritized during the first permit term.
B. Periodic BMP Structure Cleaning	County owned and operated BMPs will be maintained as specified in their O&M manuals. However, long term storm sewer catch basin maintenance schedules will be determined after the first permit term. During the first permit term all town catch basins will be cleaned on an annual basis.
C. Periodic Pavement Sweeping	All streets and MS4 owned parking lots will be swept two times per year.
D. Roadside Shoulder and Ditch Stabilization	All road side shoulder and ditches will be inspected annually.
E. Planting and Proper Care of Roadside	Roadside inspections will include

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Activity	Schedule for Performing Activity
Vegetation	vegetative inspections.
F. Remediation of Outfall Scouring	All stormwater outfalls will be evaluated for scouring and erosion on an annual basis. Decisions for remedial actions will be made at the time of problem identification.

Street Sweeping Program

The County will use its ASIST database for tracking street sweeping activities. Currently, street sweeping is done annually in the spring in subdivisions to remove debris accumulated over the winter and to keep potential pollutants from entering the storm drains. Otherwise, sweeping is done only on an "on call" basis when the County is contracted by groups, such as, home owners associations. The County has contracted with a waste disposal company to collect and dispose of all materials collected. To ensure accurate reporting and documentation of the County's pollution prevention programs, the County will track the estimated or actual amount of material by weight collected from street sweeping, as well as, the street miles swept in the maintenance database. This information will be consolidated and included in the County's Rule 13 Annual Reports submitted to IDEM.

Salt and Sand Management

The County Highway Department will manage their salt and sand storage and application in an effort to maintain public safety while minimizing the potential for salt and sand runoff. Currently salt is stored in three barns with asphalt floors that were recently constructed on the grounds of the Highway Department facilities. Sand is currently stored in the salt barns as well so the County currently has all storage areas covered or otherwise improved to minimize stormwater exposure. Beginning in 2005, the County will investigate the feasibility of utilizing catch basin inserts in the stormwater inlets at the Highway Department facilities in an effort to trap sand and other debris that may originate from the facilities. If installed, the inserts will be inspected by Highway Department personnel monthly and after significant rain events and replaced as necessary.

In addition, salt and sand is mixed and loaded into trucks on asphalt areas by the storage barns. The County makes every effort to keep this mixed material dry and from being exposed to precipitation since wet sand is more difficult for the trucks to spread. Beginning in 2005, the Highway Department will annually document the total weight/cubic yards of salt and sand applied. Also, Highway Department personnel will be instructed to contain salt and sand spilled during mixing and loading by utilizing machinery and hand tools to maintain cleanliness and minimize the risks of stormwater runoff. Also, once the snow and/or ice has melted, Highway Department personnel will sweep, as necessary, those areas of the facility that have accumulated sand and other debris as a result of day-to-day operations.

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County staff will be trained annually on the importance of containing salt and sand, the proper methods of maintaining catch basin inserts (if applicable), and documenting the amount of salt and sand applied annually. County staff will also be trained on the County's SWQMP tracking requirements and ASIST database to ensure all activities associated with salt and sand management are documented. All activities associated with salt and sand management will be included in the County's Rule 13 Annual Reports submitted to IDEM, including documenting the number and location of and the estimated or actual amount, in tons, of salt and sand used for snow and ice control.

Snow Disposal Areas

The County does not have any large accumulations of snow from highway clearing activities due to the relatively light amount of snow fall in the County. Snow is simply pushed off to the side of highways. However, beginning in 2005, snow that is cleared and pushed into large piles from County operational areas, such as, the Highway Department Facility and the Government Center will be located away from stormwater inlets and conveyances to ensure that there is minimal potential for pollutant runoff impact on MS4 area receiving waters.

Spill Prevention and Clean Up

Beginning in 2006, the County will begin implementing spill prevention and clean up procedures at County owned and operated facilities. The County Highway Department facilities will primarily be the location for which these measures will be implemented in order to reduce the impact of accidental spills of concentrated solutions, acids, alkalis, salts, oils, or other polluting materials that could contaminate stormwater runoff from areas like the maintenance facility. Measures will include using products like leak and spill wipers, mats, absorbents, and drain covers.

County has a spill response plan posted at the County Highway Department where fuels and other chemicals are used, mixed and or stored. The posting of these plans will ensure efficient and effective response to accidental chemical spills thereby reducing the potential for spills to come into contact with stormwater runoff.

If a County refueling area replaces an existing tank system or adds a new tank system, the project will be evaluated for the feasibility of installing storm water quality BMPs. If this situation occurs, the County will report on the project in the County's Rule 13 Annual Reports submitted to IDEM.

County staff will also be trained on the County's SWQMP tracking requirements to ensure all activities associated with chemical spill response are documented. The County will document all activities associated with chemical spill response. This information will be included in the County's Rule 13 Annual Reports submitted to IDEM.

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Vehicle Maintenance Areas

Vehicle maintenance areas can be significant sources of stormwater pollutants. To minimize the impacts vehicle maintenance areas have on stormwater runoff, the County utilizes oil and water separators within the Highway Department's two maintenance facilities. The oil and water separators are operated and maintained according to the manufacturer's specifications. Beginning in 2005, the County will begin documenting all maintenance activities associated with the oil and water separators. Relevant staff will receive annual training on the function and importance of the separator, how to maintain the separator and how to properly dispose of the oil and grit collected. The County will document training activities, maintenance activities, and estimate the amount of waste collected via the separator. The County will also document the methods by which all materials collected were disposed of. This information will be included in the County's Rule 13 Annual Reports submitted to IDEM.

In 2005, the County will investigate where discharges flow from their shop floor drains and other conveyances in their highway facility. All shop floor drains will either be sealed or connected to a publicly owned treatment works. All stockpiled materials will be located away from storm inlets and other stormwater conveyances. The Highway Facility yard will be kept in an orderly manner and clear of debris or other materials that may be mobilized in stormwater runoff.

County staff will also be trained on the County's SWQMP tracking requirements to ensure all activities related to improving storm water quality associated with oil and water separator and vehicle maintenance area are documented. All activities associated with this BMP will be included with the County's Rule 13 Annual Reports submitted to IDEM.

Wash Water Management

All wash waters and wastewaters are currently prohibited from entering waters of the state without a valid NPDES Wastewater Permit. Pollutants from washing activities, such as, detergents and solids can not enter into separate storm water conveyances unless they are properly controlled. As identified in Part B, the County will implement procedures, such as, requiring vehicles to be washed at a commercial car wash to eliminate all equipment or vehicle wash waters and concrete or asphalt hydro demolition wastewaters from entering stormwater runoff beginning in March 2005. Currently, all County cars are taken to commercial car washes. In 2005, the County will investigate the best method for handling washing activities for 36 large trucks. The County will report on wash waters eliminated and new BMPs installed, if applicable in the County's Rule 13 Annual Reports submitted to IDEM.

Fertilizer and Pesticide Management

County Staff members utilize fertilizers and pesticides for a variety of purposes. The following actions will help minimize pesticide and fertilizer use for the County and will help minimize the impacts of these chemicals on stormwater runoff. In 2005, the County will develop a list of all County staff who store, transport, or apply fertilizer

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and/or pesticides as well as which facilities are utilized for storage purposes. These staff members will be required, beginning in 2005, to receive annual training on proper handling, mixing, use, and storage of fertilizers and pesticides. If necessary, additional County staff will be required to obtain training to apply pesticides from the Office of the State Chemist (OISC). Currently the County has four staff members that have their OISC commercial applicator certification and attend annual training.

All facilities in which fertilizers and pesticides are stored will be evaluated annually for safety. In the event a facility is determined to pose a stormwater risk, the County will take the proper steps to ensure fertilizers and pesticides are stored properly. The County will document all activities associated with fertilizer and pesticide management including the areas within the County's MS4 area on which fertilizers and pesticides are utilized and to estimate the amount of each material utilized. County staff will receive annual training on the County's SWQMP tracking requirements to ensure all activities associated with fertilizers and pesticides are documented. All information specific to fertilizer and pesticide management will be included in the County's Rule 13 Annual Reports submitted to IDEM.

Canine Park Location

Pet waste has been shown to be a major contributor of stormwater pollution. If applicable and necessary, Allen County will require that all Canine Parks must be sited at least one hundred fifty (150) feet away from a surface waterbody. The County will track the number or percentage and location of Canine Parks sited at least one hundred fifty (150) feet away from a surface waterbody. Special attention will be paid to any potential Canine Parks being located in priority watershed areas. The Surveyor's office will review sites in conjunction with construction plan reviews and report results in the County's Rule 13 Annual Reports submitted to IDEM.

Waste Disposal

Removal of accumulated materials (wastes) is part of routine maintenance of the conveyance system. Wastes are also generated from County operational areas. The County will ensure that wastes collected are disposed of in a manner that prevents them from contaminating stormwater runoff. Beginning in 2005, the County will document the disposal of all waste generated from operational areas and from maintaining the County's stormwater conveyance system. Such wastes include, but are not limited to, dredge spoil, accumulated sediments, floatables and debris. Currently adjacent property owners are contacted by the County to see if they would like to reuse the material as fill. County staff will continue to determine if the waste generated can be reused, recycled or requires disposal in a sanitary landfill. The County will contract with a private firm for those wastes that require disposal in a landfill. Relevant County staff will receive training on the County's SWQMP tracking requirements to ensure all activities associated with waste disposal are documented. The County will document all activities associated with waste disposal including the types of waste generated, the amount of waste generated and the method by which the waste was disposed. This information will be included in the County's Rule 13 Annual Reports submitted to IDEM.

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Flood Management Projects

The County will document that new county-owned flood management projects are assessed for their impacts on water quality on an on-going basis and in 2007, existing county owned flood management projects (if there are any) are examined for incorporation of additional water quality protection devices or practices. During the pre-construction phase for new projects, a determination will be made to see if a practice can be modified to address the reduction of pollutants associated with stormwater runoff or if additional BMPs can be designed into the watershed of the project to improve the water quality. This preliminary review will better use limited resources to plan for water quality BMPs before a project is constructed since water quality and water quantity issues are interrelated.

Existing flood management projects and structural BMPs built to address stormwater quantity problems will be reviewed to determine if it is feasible to retrofit them with stormwater quality control measures. Where it is not feasible to retrofit the practice, alternative approaches may include implementation of practices within the watershed of a basin. Each existing project and BMP may not support a retrofit, but the review will be conducted and results will be reported in the County's Rule 13 Annual Reports submitted to IDEM.

Annual IDDE, Good Housekeeping, and Pollution Prevention Staff Training

The County will conduct training for staff on the hazards associated with illicit discharges and improper disposal of waste and pollution prevention, including ways to manage activities to prevent substantial quantities of chemicals and water from entering the conveyance system. Appropriate MS4 entity staff will be trained beginning in 2006 and periodic refresher sessions will be conducted at least annually. The County will document training opportunities provided and attendees. Trainings will emphasize how substantial quantities of chemicals and water can lead to elevated levels of nutrients and toxins in receiving waters. Information will be presented on priority watersheds and sensitive areas. Additional topics will include proper storage and disposal of hazardous wastes, vegetative waste handling, fertilizer and pesticide application, and the function of implemented BMPs. The number of trainings, number of staff attending trainings, and information presented will be tracked and reported in the County's Rule 13 Annual Reports submitted to IDEM.

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**Table 8-2
Pollution Prevention and Good Housekeeping BMPs**

Best Management Practice (BMP)	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Priority Areas	Responsible Party
MS4 Conveyance System Maintenance	<ul style="list-style-type: none"> • Conduct inspection and maintenance program beginning in 2005. • Prioritize maintenance needs based on inspections and improve as funding allows. • Conduct annual training, beginning in 2005. • Track using Programmatic Indicators #26, #27, #28, #29, and #32. 	Begin in 2005, then on-going.	Unstable, unvegetated, scoured, or eroded roadside shoulders and/or ditches.	Outsourced and Highway Department.
Street Sweeping Program	<ul style="list-style-type: none"> • Implement tracking system by March 2005. • Track using Programmatic Indicator #33. 	Begin tracking March 2005.	Remove salt, sand, and debris from winter activities.	Highway Department.
Salt and Sand Management	<ul style="list-style-type: none"> • Implement BMPs beginning in 2005 and as part of on-going permit activities and as budgets allow. • Track using Programmatic Indicators #30 & #31. 	<ul style="list-style-type: none"> • Begin in 2005, then on-going. • In 2005, investigate catch basin insert use. 	Application on County Highways and Highway Department Facilities.	Highway Department
Snow Disposal Areas	Use designated areas beginning in Winter 2005, then on-going each Winter.	Begin in 2005, then on-going each winter.	Highway Department Facilities and Government Center.	Highway Department

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Best Management Practice (BMP)	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Priority Areas	Responsible Party
Spill Prevention and Clean Up	<ul style="list-style-type: none"> Conduct as part of on-going permit activities. Track using Programmatic Indicator #23, if applicable, & #24. 	Begin in 2006, then on-going.	Highway Department Facilities	Highway Department
Vehicle Maintenance Areas	Begin in 2005, then activities will be on-going as part of regular good housekeeping practices.	Begin in 2005, then on-going.	Highway Department Facilities, especially around storm inlets and/or conveyances.	Outsourced and Highway Department.
Wash Water Management	Eliminate wash waters from entering separate storm system in 2005.	<ul style="list-style-type: none"> Begin in 2005, then on-going. In 2005, investigate alternative for large truck washing. 	Highway Department Facilities	Outsourced and Highway Department.
Fertilizer and Pesticide Management	<ul style="list-style-type: none"> Ensure contractors are certified by OISC. Track using Programmatic Indicator #25. 	Begin in 2005, then on-going.	Train contract staff on priority watersheds and sensitive areas, as well as, stormwater program.	Outsourced and Highway Department.
Canine Park Location	If applicable, Allen County will track the number or percentage and location of canine parks sited at least one hundred fifty (150) feet away from a surface waterbody to compile with Programmatic Indicator #34.	If necessary.	Special attention will be paid to any potential canine parks being located in priority watershed areas.	Surveyor's office
Waste Disposal	<ul style="list-style-type: none"> Document disposal of all wastes, beginning in 2005. On-going, determine if waste can be recycled, reused, or 	Begin in 2005, then on-going.	Highway Department Facilities	Outsourced and Highway Department.

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Best Management Practice (BMP)	Measurable Goals, Tracking, and Programmatic Indicators	Timeline	Priority Areas	Responsible Party
	<ul style="list-style-type: none"> • goes to landfill • Contract with private firm in 2005. 			
<p align="center">Flood Management Projects</p>	<ul style="list-style-type: none"> • On-going, document that all new and existing flood management projects are assessed for incorporation of additional water quality devices or practices. • Review of existing projects completed by 2007. 	<p>On-going documentation and review in 2007.</p>	<p>Projects in priority watershed areas will be reviewed first.</p>	<p>Surveyor's office.</p>
<p align="center">Annual IDDE, Good Housekeeping, & Pollution Prevention Staff Training</p>	<ul style="list-style-type: none"> • Develop training program by March 2006. • Conduct first training course in 2006. • Conduct annual refresher training. • Track using Programmatic Indicator #2. 	<p>Training held in 2006, then annual updates.</p>	<p>Focus on MS4 conveyance system, MS4 operational areas, and Highway Department Facilities.</p>	<p>Outsourced.</p>

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9.0

MS4 PROGRAM COSTS

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

The overall fiscal impact of the requirement of Rule 13 may be grouped under three categories: SWQMP Development costs, Part C Implementation costs, and "other" compliance costs. This chapter details the cost of plan implementation (Part C) and it includes the additional expense for developing the SWQMP, continuous characterization, and data reporting. In the numbers detailed below, no monetary value is placed on volunteer hours.

9.1 SWQMP DEVELOPMENT COSTS

The development of the SWQMP must be completed by the end of the first year of the permit term. Tasks include completion of a Notice of Intent (NOI), and completion of Part A, Part B, and Part C (this document) of the SWQMP.

NOI and Part A: The costs associated with completion of the NOI and Part A are mainly organizational and administrative. An initial list of known receiving waters was compiled. Public Notice was published in the local newspaper. Preliminary estimates of existing and expected budgets had to be included, and an Operator was identified. The estimated cost to compile the information needed for the NOI and Part A submittal was \$4,000.

Part B Baseline Characterization: Part B involved collection and assessment of existing data for the receiving waters identified in Part A. This data was then used to characterize the baseline water quality conditions in the MS4 area, identify sensitive areas, and guide the development of Part C. Existing BMPs had to be identified and their effectiveness evaluated. The tasks associated with Part B were research, analysis, and report writing. The estimated cost to complete Part B was \$22,000. This cost does not include additional costs associated with responding to the NOD that the IDEM issued the County.

Development of the Part C Implementation Plan: The estimated cost for developing an Implementation Plan is \$49,000 and includes fees for engineering consultants and includes time and materials contributed by Allen County.

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9.2 DETAILED PART C IMPLEMENTATION COSTS BY MCM OVER 2004-2008

This section details the cost of implementing the program described in this document. There are 6 MCMs within the implementation plan. Costs for each individual MCM are summarized below. Since different plan elements have different start-up timelines, costs are also broken down by permit year, March through December.

MCM #1 Public Education and Outreach: The cost to implement this MCM throughout the first 5-year permit term is estimated to be \$95,000. Most of the implementation deadlines for this MCM are in the second permit year with some start-up costs incurred during the second permit year. Estimated annual costs for this MCM are \$25,000 for the second year, \$24,000 for the third year, and \$23,000 for the fourth and fifth years. These costs will cover such tasks as reproduction and distribution of educational brochures, web site development and maintenance, and other tasks as outlined in Chapter 3. The County will work with the ACPWQ to complete the BMPs in this plan.

MCM #2 Public Participation and Involvement: The cost to implement this MCM throughout the first 5-year permit term is estimated to be \$138,000. Most of the implementation deadlines for this MCM are in the second permit year with some start-up costs incurred during the second permit year. Estimated annual costs for this MCM are \$14,000 for the first year and \$31,000 for the second, third, fourth, and fifth years. These costs will cover such tasks as public involvement in plan development, promotion of Clean-Up Events, the "Report-A-Polluter" Program, and Storm Drain Marking events. The costs include presentation materials for public meetings and hearings, mailings to volunteer groups.

MCM #3 Illicit Discharge Detection and Elimination: The cost to implement this MCM throughout the first 5-year permit term is estimated to be \$946,000. The implementation deadlines for this MCM are mainly in the second permit year, with some start-up costs beginning in the first permit year. Annual costs for this MCM are \$18,000 for the first year, \$238,000 for the second year, and \$230,000 for the third, fourth and fifth years. These costs will cover such tasks as mapping the storm sewer system and screening for pollutants, development of an illicit discharge ordinance, and collection of household hazardous wastes and lawn wastes. The costs include training for system inspectors, field equipment for system inspectors, computer hardware and software upgrades for GIS mapping, and staff hours.

MCM #4 Construction Site Runoff Control: The cost to implement this MCM throughout the first 5-year permit term is estimated to be \$1,813,000. The implementation deadlines for this MCM are mainly in the second permit year, with some preparation work beginning in the first permit year. Annual costs for this MCM are \$13,000 for the first year and \$450,000 for the second, third, fourth, and fifth years. These costs will cover such tasks as development of an ordinance for controlling construction site runoff, establishment of a local stormwater permit procedure, and an inspection and

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enforcement program. The costs include training for plan reviewers, and site inspectors, computer hardware and software upgrades tracking, and staff hours.

MCM #5 Post-Construction Stormwater Management: The cost to implement this MCM throughout the permit life is estimated to be \$131,000. The implementation deadlines for this MCM are mainly in the second permit year, with some preparation work beginning in the first permit year. Annual costs for this MCM are \$27,000 for the first year and \$26,000 for the second, third, fourth, and fifth years. These costs will cover such tasks as development of an ordinance for post-construction stormwater quality management, establishment of a local stormwater permit procedure, and an inspection and enforcement program. The costs include training for plan reviewers, site inspectors, computer hardware and software upgrades for tracking, and staff hours.

MCM #6 Pollution Prevention and Good Housekeeping: The cost to implement this MCM throughout the first 5-year permit term is estimated to be \$478,000. The implementation deadlines for this MCM are entirely delayed until after the first permit year. Annual costs for this MCM are \$30,000 for the first year and \$112,000 for the second, third, fourth, and fifth years. These costs will cover such tasks as the development of maintenance schedules and a database, the implementation of Salt and Sand Storage BMPs, an MS4 Conveyance System Maintenance Plan, and staff training.

9.3 OTHER COMPLIANCE COSTS 2005 – 2008

Beyond development and implementation of the SWQMP, Rule 13 requires on-going MS4 area characterization, monthly and annual status reports, and renewal of permit application at the end of the 5 year permit term.

On-going Characterization: Rule 13 requires regulated communities to continue collecting and evaluating data on water quality throughout the permit life. The cost for this on-going characterization assumes that the County will implement a River Watch program, conduct a watershed study in a priority watershed, and encourage other watershed groups to do water quality characterization studies. The estimated cost for on-going characterization is \$25,000 dollars per year. This cost estimate includes report generation. On-going mapping and screening are included in the cost for MCM 3 implementation.

Status Reporting: Much of the data collection and data management cost of this task is absorbed by the implementation of the MCMs. The estimated cost to compile and organize the volume of data that will be generated is \$5,000 per year. IDEM has provided a template for monthly and annual reports. For each annual report, some additional time and effort will be needed to evaluate the effectiveness of the plan and to determine if adjustments are needed to the BMPs and/or measurable goals. This cost is included in the estimates above.

Permit Application Renewal: At the end of this five-year permit term, the County will need to take a close look at what is and is not working with their plan. Additional BMPs

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can be added and ineffective BMPs can be dropped. It is expected that the level of effort needed to complete the evaluation of the existing program, make changes, and submit a permit renewal application to IDEM will be similar to the effort required for the original. Therefore, the estimated cost to prepare the permit renewal application is \$50,000 (includes 5 years of inflation).

On-going As Needed Technical Assistance: Throughout the term of the permit, the County may require assistance in the form of professional engineering services in order to address tasks associated with NPDES Phase II compliance issues. These tasks may include, but are not limited to, BMP evaluation, MS4 conveyance mapping, plan reviews, inspections, training modules, ordinances, and coordination with IDEM. The cost for on-going technical assistance is estimated to be \$25,000 for each year.

New Staff: The County will need to hire at least three additional staff to meet the workload demands of the Rule 13 program. It is anticipated that the County will hire an MS4 Coordinator, Technical/Engineer position, and an inspector. The estimated cost for these three staff positions is estimated to be \$200,000 for each year.

9.4 TOTAL SWQMP PROGRAM COSTS 2004 – 2008

Table 9-1 summarizes total program costs, which includes the costs for all tasks described above in Sections 9.1, 9.2, and 9.3. The total estimated cost of compliance with Rule 13 is \$4,746,000 for the first 5-year permit term.

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**Table 9-1
Total Program Costs**

	November 2003-Mar. 2005	Mar. 2005- Dec. 2005	Mar. 2006- Dec. 2006	Mar. 2007- Dec. 2007	Mar. 2008- Nov. 2008	Total
NOI and SWQMP Part A	\$4,000	N/A	N/A	N/A	N/A	\$4,000
SWQMP Part B	\$22,000	N/A	N/A	N/A	N/A	\$22,000
SWQMP Part C (development)	\$49,000	N/A	N/A	N/A	N/A	\$49,000
Implement MCM1	\$0	\$25,000	\$24,000	\$23,000	\$23,000	\$95,000
Implement MCM2	\$14,000	\$31,000	\$31,000	\$31,000	\$31,000	\$138,000
Implement MCM3	\$18,000	\$238,000	\$230,000	\$230,000	\$230,000	\$946,000
Implement MCM4	\$13,000	\$450,000	\$450,000	\$450,000	\$450,000	\$1,813,000
Implement MCM5	\$27,000	\$26,000	\$26,000	\$26,000	\$26,000	\$131,000
Implement MCM6	\$30,000	\$112,000	\$112,000	\$112,000	\$112,000	\$478,000
On-going Characterization	N/A	\$25,000	\$25,000	\$25,000	\$25,000	\$100,000
Annual Report	N/A	\$5,000	\$5,000	\$5,000	\$5,000	\$20,000
Permit Renewal	N/A	N/A	N/A	N/A	\$50,000	\$50,000
On-going Assistance	N/A	\$25,000	\$25,000	\$25,000	\$25,000	\$100,000
New Staff	\$0	\$200,000	\$200,000	\$200,000	\$200,000	\$800,000
Total	\$177,000	\$1,137,000	\$1,128,000	\$1,127,000	\$1,177,000	\$4,746,000

9.5 BUDGETARY NEEDS

The total estimated costs provided above are gross costs. Some of the costs are already covered by existing budgets or passed on to the permit applicants/development communities. If these costs/resources are taken into account, the additional amount needed to achieve compliance with Rule 13 would reduce to approximately \$2,093,000. The estimated net annual costs breakdown is \$38,000 for the first year (2004), \$507,000 for the second year (2005), \$499,000 for the third year (2006), \$499,000 for the fourth year (2007), and \$550,000 for the fifth year (2008). In order begin implementing requirements of Rule 13; the County will rely on a combination of permit fees, general fund dollars, and potentially additional user fees.

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10.0

SUMMARY

Implementation of Allen County's Rule 13 required stormwater quality program will improve the overall quality of stormwater discharges entering into the County's separate storm sewer system. In order to successfully implement the Rule 13 program, the County must pay attention to reporting requirements contained in the programmatic indicators, adhere to mandated time lines, and be aware of next steps beyond the Part C document.

10.1 PROGRAMMATIC INDICATORS

As a visual aid to Allen County and to help evaluate Rule 13 permit compliance, **Table 10-1** lists the programmatic indicators that are required in Rule 13. The table further identifies those required and chosen BMPs that will fulfill these required programmatic indicators.

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**Table 10-1
Programmatic Indicators**

Programmatic Indicator	Description	BMP addressing Programmatic Indicator
1	Number or percentage of citizens, segregated by type of constituent that have an awareness of storm water quality issues.	Stormwater Survey
2	Number and description of meetings, training sessions, and events conducted to involve citizen constituents in the storm water program.	<ul style="list-style-type: none"> • Rule 13 Public Participation Lists • Public Meetings • Training for Construction Professionals • Storm Drain Marking • Annual IDDE, Good Housekeeping, & Pollution Prevention Staff Training • "Report-A-Polluter" Program
3	Number or percentage of citizen constituents that participate in storm water quality improvement programs.	<ul style="list-style-type: none"> • Rule 13 Public Participation Lists • Public Meetings • Training for Construction Professionals • Storm Drain Marking • "Report-A-Polluter" Program
4	Number and location of storm drains marked or cast, segregated by marking method.	Storm Drain Marking
5	Estimated or actual linear feet or percentage of MS4 mapped and indicated on an MS4 area map.	Stormwater System Map
6	Number and location of MS4 area outfalls mapped.	Stormwater System Map
7	Number and location of MS4 area outfalls screened for illicit discharges.	Illicit Discharge Detection and Elimination Plan
8	Number and location of illicit discharges detected.	Illicit Discharge Detection and Elimination Plan
9	Number and location of illicit discharges eliminated.	Illicit Discharge Detection and Elimination Plan
10	Number of and estimated or actual amount of material, segregated by type, collected from HHW collections in the MS4 area.	Solid Waste Management District Promotions
11	Number and location of constituent drop-off centers for automotive fluid recycling.	Solid Waste Management District Promotions

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Programmatic Indicator	Description	BMP addressing Programmatic Indicator
12	Number or percentage of constituents that participate in the HHW collections.	Solid Waste Management District Promotions
13	Number of construction sites obtaining an MS4 entity-issued storm water run-off permit in the MS4 area.	<ul style="list-style-type: none"> • Erosion and Sediment Control and Post-Construction BMP Tracking Database • Erosion and Sediment Control Ordinance • Post-Construction Control Ordinance
14	Number of construction sites inspected.	Erosion and Sediment Control and Post-Construction BMP Tracking Database
15	Number and type of enforcement actions taken against construction site operators.	<ul style="list-style-type: none"> • Erosion and Sediment Control and Post-Construction BMP Tracking Database • Procedures for Prioritizing Construction Activities
16	Number of, and associated construction site name and location for, public informational requests received.	Erosion and Sediment Control and Post-Construction BMP Tracking Database
17	Number, type, and location of structural BMPs installed.	Erosion and Sediment Control and Post-Construction BMP Tracking Database
18	Number, type, and location of structural BMPs inspected.	Erosion and Sediment Control and Post-Construction BMP Tracking Database
19	Number, type, and location of structural BMPs maintained or improved to function properly.	Post-Construction BMP Operation and Maintenance Plan
20	Type and location of nonstructural BMPs utilized.	Erosion and Sediment Control and Post-Construction BMP Tracking Database
21	Estimated or actual acreage or square footage of open space preserved and mapped in the MS4 area, if applicable.	Erosion and Sediment Control and Post-Construction BMP Tracking Database
22	Estimated or actual acreage or square footage of pervious and impervious surfaces mapped in the MS4 area, if applicable.	Not Applicable; County not set up to track
23	Number and location of new retail gasoline outlets or municipal, state, federal, or institutional refueling areas, or outlets or refueling areas that replaced existing tank systems that have installed storm water BMPs.	Not Applicable; County not set up to track

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Programmatic Indicator	Description	BMP addressing Programmatic Indicator
24	Number and location of MS4 entity facilities that have containment for accidental releases of stored polluting materials.	Spill Prevention and Clean Up
25	Estimated or actual acreage or square footage, amount, and location where pesticides and fertilizers are applied by a regulated MS4 entity to places where storm water can be exposed within the MS4 area.	Fertilizer and Pesticide Management
26	Estimated or actual linear feet or percentage and location of unvegetated swales and ditches that have an appropriately-sized vegetated filter strip.	MS4 Conveyance System Maintenance
27	Estimated or actual linear feet or percentage and location of MS4 conveyances cleaned or repaired.	MS4 Conveyance System Maintenance
28	Estimated or actual linear feet or percentage and location of roadside shoulders and ditches stabilized, if applicable.	MS4 Conveyance System Maintenance
29	Number and location of storm water outfall areas remediated from scouring conditions, if applicable.	MS4 Conveyance System Maintenance
30	Number and location of deicing salt and sand storage areas covered or otherwise improved to minimize storm water exposure.	Sand and Sand Management
31	Estimated or actual amount, in tons, of salt and sand used for snow and ice control.	Salt and Sand Management
32	Estimated or actual amount of material by weight collected from catch basin, trash rack, or other structural BMP cleaning.	<ul style="list-style-type: none"> • MS4 Conveyance System Maintenance • Waste Disposal
33	Estimated or actual amount of material by weight collected from street sweeping, if utilized.	Street Sweeping Program
34	If applicable, number or percentage and location of canine parks sited at least one hundred fifty (150) feet away from a surface waterbody.	Canine Park Location

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10.2 Master Timeline

The following Master Time outlines all BMPs that have been and will be completed by Allen County during their first five-year permit term.

Permit Year	MCM	BMP
2004	1	<ul style="list-style-type: none"> • Newsletter Articles (4) • Soil & Water Conservation District Activities
	2	<ul style="list-style-type: none"> • Public Meetings
	3	<ul style="list-style-type: none"> • Illicit Discharge Detection & Elimination (IDDE) Ordinance Development
	4	<ul style="list-style-type: none"> • Erosion & Sediment Control Ordinance
	5	<ul style="list-style-type: none"> • Post-Construction Control Ordinance • Post-Construction BMP Operation and Maintenance Plan
2005	1	<ul style="list-style-type: none"> • Training for Construction Professionals • Newsletter Articles (4) • Web site • Stormwater Survey • Distribute Stormwater Educational Brochures • Solid Waste Management District Promotions • Soil & Water Conservation District Activities • Mass Media Opportunities
	2	<ul style="list-style-type: none"> • Develop Rule 13 Public Participation List • Public Meeting • Storm Drain Marking
	3	<ul style="list-style-type: none"> • Stormwater System Map • IDDE Plan • IDDE and Good Housekeeping & Pollution Prevention Staff Training
	4	<ul style="list-style-type: none"> • Plan Review, Site Inspection, and Enforcement • Staff Training • Use Erosion & Sediment Control and Post-construction BMP Tracking Database • Develop and Implement Procedure for Prioritizing Construction Activities • Inspection and Enforcement Documentation • QA/QC of Overall Program
	5	<ul style="list-style-type: none"> • Included with MCM #4

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Permit Year	MCM	BMP
	6	<ul style="list-style-type: none"> • MS4 Conveyance System Maintenance • Street Sweeping Program • Salt and Sand Management • Snow Disposal Areas • Spill Prevention and Clean Up • Vehicle Maintenance Areas • Wash Water Management • Fertilizer and Pesticide Management • Canine Park Location, if applicable • Waste Disposal • Flood Management Projects
2006	1	<ul style="list-style-type: none"> • Training for Construction Professionals • Newsletter Articles (4) • Web Site • Distribute Stormwater Educational Brochures • Solid Waste Management District Promotions • Soil & Water Conservation District Activities
	2	<ul style="list-style-type: none"> • Update Rule 13 Public Participation List • Storm Drain Marking • "Report-A-Polluter" Program
	3	<ul style="list-style-type: none"> • Stormwater System Map • IDDE Plan • IDDE and Good Housekeeping & Pollution Prevention Staff Training
	4	<ul style="list-style-type: none"> • Plan Review, Site Inspection, and Enforcement • Staff Training • Use Erosion & Sediment Control and Post-construction BMP Tracking Database • Implement Procedure for Prioritizing Construction Activities • Inspection and Enforcement Documentation • QA/QC of Overall Program
	5	<ul style="list-style-type: none"> • Included with MCM #4

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Permit Year	MCM	BMP
	6	<ul style="list-style-type: none"> • MS4 Conveyance System Maintenance • Street Sweeping Program • Salt and Sand Management • Snow Disposal Areas • Spill Prevention and Clean Up • Vehicle Maintenance Areas • Wash Water Management • Fertilizer and Pesticide Management • Canine Park Location, if applicable • Waste Disposal • Flood Management Projects
2007	1	<ul style="list-style-type: none"> • Training for Construction Professionals • Newsletter Articles (4) • Web Site • Distribute Stormwater Educational Brochures • Solid Waste Management District Promotions • Soil & Water Conservation District Activities
	2	<ul style="list-style-type: none"> • Update Rule 13 Public Participation List • Storm Drain Marking • "Report-A-Polluter" Program
	3	<ul style="list-style-type: none"> • Stormwater System Map • IDDE Plan • IDDE and Good Housekeeping & Pollution Prevention Staff Training
	4	<ul style="list-style-type: none"> • Plan Review, Site Inspection, and Enforcement • Staff Training • Use Erosion & Sediment Control and Post-construction BMP Tracking Database • Implement Procedure for Prioritizing Construction Activities • Inspection and Enforcement Documentation • QA/QC of Overall Program
	5	<ul style="list-style-type: none"> • Included with MCM #4

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Permit Year	MCM	BMP
	6	<ul style="list-style-type: none"> • MS4 Conveyance System Maintenance • Street Sweeping Program • Salt and Sand Management • Snow Disposal Areas • Spill Prevention and Clean Up • Vehicle Maintenance Areas • Wash Water Management • Fertilizer and Pesticide Management • Canine Park Location, if applicable • Waste Disposal • Flood Management Projects
2008	1	<ul style="list-style-type: none"> • Training for Construction Professionals • Newsletter Articles (4) • Web Site • Stormwater Survey • Distribute Stormwater Educational Brochures • Solid Waste Management District Promotions • Soil & Water Conservation District Activities
	2	<ul style="list-style-type: none"> • Update Rule 13 Public Participation List • Storm Drain Marking • "Report-A-Polluter" Program
	3	<ul style="list-style-type: none"> • Stormwater System Map • IDDE Plan • IDDE and Good Housekeeping & Pollution Prevention Staff Training
	4	<ul style="list-style-type: none"> • Plan Review, Site Inspection, and Enforcement • Staff Training • Use Erosion & Sediment Control and Post-construction BMP Tracking Database • Implement Procedure for Prioritizing Construction Activities • Inspection and Enforcement Documentation • QA/QC of Overall Program
	5	<ul style="list-style-type: none"> • Included with MCM #4

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Permit Year	MCM	BMP
	6	<ul style="list-style-type: none"> • MS4 Conveyance System Maintenance • Street Sweeping Program • Salt and Sand Management • Snow Disposal Areas • Spill Prevention and Clean Up • Vehicle Maintenance Areas • Wash Water Management • Fertilizer and Pesticide Management • Canine Park Location, if applicable • Waste Disposal • Flood Management Projects

