

## Small Municipal Separate Storm Sewer Systems in Douglas and Sarpy Counties – Stormwater Management Plan

Measurable goals listed in the Stormwater Management Plan are target goals on which progress will be reported on in the annual report.

<b>A. Public Education and Outreach</b>		
<b>BMP#</b>	<b>SWMP Element Description</b>	<b>Target Goals &amp; Implementation Schedule</b>
1, 3, & 4.	Develop a plan for outreach that defines the goals, objectives, target audience and distribution process of materials for the public education and outreach program	<b>Year 1 - Develop</b> a 5 year education and outreach plan. Submit the plan to NDEQ with the Annual Report. <b>Years 2-5</b> – Review and update the plan each permit year and include the revised plan in the Annual Report.
2.	Maintain and update appropriate messages for targeted residential, construction, and commercial issues.	<b>Year 1</b> – Inventory current outreach materials in each of these targeted areas and develop new materials as needed. <b>Years 2-5</b> – Provide copies of new outreach materials in the annual report.

<b>B. Public Participation and Involvement</b>		
<b>BMP#</b>	<b>SWMP Element Description</b>	<b>Target Goals &amp; Implementation Schedule</b>
1.	Provide opportunities for citizens to comment on new rules, ordinances, and regulations regarding the MS4.	<b>On-Going All Years</b> - Post on the Sarpy County Website proposed changes to rules, ordinances, and regulations. Provide information in the annual report on approved changes and input received from the public.
2.	Create opportunities for citizens to participate in the implementation of stormwater controls.	<b>On-Going All Years</b> - Post on the Papillion Creek Watershed Partnership Website opportunities for public involvement in stormwater control related activities.
3.	Provide access to information about the Sarpy County SWMP.	<b>On-Going All Years</b> – Maintain current Sarpy County SWMP and MS4 annual reports on the Papillion Creek Watershed Partnership Website.

**C. – Illicit Discharge Detection and Elimination**

BMP#	SWMP Element Description	Target Goals & Implementation Schedule
1. a	Maintain a compliance plan or mechanism to follow up on illicit discharges.	<b>Year 1</b> – Develop a compliance plan for following up on illicit discharges. <b>On-Going All Years</b> – Maintain the compliance procedures per the permit requirements.
1. b	Maintain a map showing all known MS4 outfalls and the location of all state-designated waters receiving direct discharges from MS4 outfalls.	<b>On-Going All Years</b> – Maintain a continually updated storm sewer system map per the permit requirements.
1. c	Conduct field screening activities per the permit requirements (set forth in 40 CFR Part 122.26(d)(1)(iv)(D)) specifically geared to local TMDL pollutants of concern such as E. Coli and to eliminate illicit discharges.	<b>Year 1</b> – Develop dry weather screening, sampling, and quality control plan to address pollutants of concern. Conduct screening under current plan during Year 1. <b>On-Going All Years</b> – Annually conduct dry weather monitoring according to screening and sampling plan.
1. d	Implement procedures to investigate and trace sources of identified illicit discharges to the MS4.	<b>On-Going All Years</b> – Document investigations include date observed, result of investigation(s) and date closed.
1. e	Implement procedures to remove illicit discharges to the MS4. Document all interactions with potentially responsible parties.	<b>On-Going All Years</b> – Use the code enforcement procedures to eliminate unauthorized non-stormwater discharges identified during an investigation
1. f	Identify and address allowable non-stormwater discharges determined to be significant contributors to pollutants. Identify any additional non-stormwater discharges that will not be addressed as illicit discharges.	<b>On-Going All Years</b> – Report on any local controls or conditions placed upon exempt non-stormwater discharges and additional identified exempted non-stormwater discharges.
2 & 3.	Coordinate with adjacent permitted MS4s to report illicit discharges to the appropriate authority having jurisdiction and respond to reports from other MS4s.	<b>Year 1</b> – Develop procedures for coordination with adjacent permitted MS4's. <b>On-Going All Years</b> – Include in the annual report any known illicit discharge reports to and from adjacent MS4s.
4.	Maintain written procedures for the IDDE component of the MS4 permit.	<b>Year 1</b> – Develop written procedures for the IDDE component of the MS4 permit. <b>On-Going All Years</b> – Make available upon request the standard operating procedures developed under this program component.
5.	Receive reports and complaints, internally and from the public, of illicit discharges and illegal dumping into the MS4. Respond to and investigate complaints about spills, dumping, or disposal of materials other than stormwater to the MS4.	<b>On-Going All Years</b> – Coordinate with others in the (City/County) to resolve complaints. Develop a system to generate reports and track the number of calls per year in regard to spills, dumping or improper disposal of material to the MS4. Include a count of complaints received and investigations completed in the annual report.

6.	Develop, implement and maintain a training program for municipal field staff with respect to IDDE.	<b>Year 1</b> – Develop a strategy which identifies field staff and appropriate levels of training. <b>Years 2 - 5</b> – Provide a count of employees which have received training in the annual report.
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**D. Construction Site Runoff Control**

<b>BMP#</b>	<b>SWMP Element Description</b>	<b>Target Goals &amp; Implementation Schedule</b>
1.	Maintain the established program requiring operators of public or private construction activities to comply with local erosion and sediment control requirements.	<b>On-Going All Years</b> -Include any updates to Sarpy County Code or Permit requirements in the annual report.
2.	Maintain a compliance plan or mechanism to follow up on construction site non-compliance.	<b>Year 1</b> – Develop compliance plan to follow up on construction site non-compliance. <b>On-Going All Years</b> – Maintain the compliance procedures per the permit requirements.
3.	Review grading permit applications and maintain a continually updated inventory of all private and public construction sites.	<b>On-Going All Years</b> – Include in the annual report the number and type of grading permits reviewed.
4.	Maintain the electronic records for inspection of construction sites and enforcement of erosion and sediment control measures.	<b>Year 1</b> – Develop a strategy for site inspections by municipal staff, and include in the annual report. <b>On-Going All Years</b> –Inspect construction sites on a regular basis and on a complaint basis. Track the number of sites inspected annually in a database. Initiate enforcement proceedings as appropriate to address violations. Include a summary of inspections completed and enforcement actions taken in the annual report.
5.	Provide training for municipal staff with respect to their assigned duties as it relates to sediment and erosion control from construction activity. One formal training course for inspection staff during their employment with the City and internal training on an as needed basis to maintain consistent reporting among all inspectors.	<b>On-Going All Years</b> -Include in the annual report the number of staff and their sediment and erosion control training completed.
6.	Communicate with the regulated community and other groups affected by the Construction Site Runoff program and provide a mechanism to receive complaints from the public.	<b>On-Going All Years</b> – Conduct workshops for developers, builders, site designers, contractors, and/or Sarpy County staff as determined necessary. Track reports from the public regarding construction sites. Include the number of reports received in the annual report and the permittees response.

**E. Post Construction Runoff Control**

<b>BMP #</b>	<b>SWMP Element Description</b>	<b>Measurable Commitments &amp; Implementation Schedule</b>
1.	Continue to implement the Post Construction Program as stipulated in the Sarpy County code. Periodically update guidance material and develop divergent standards for difficult sites such as linear projects. Update as needed the Omaha Regional Stormwater Design Manual (ORSDM).	<b>Year 1</b> - Develop divergent standards for guidance document and update guidance as needed. Submit standards with the annual report. <b>On-going All Years</b> - Revise as necessary. Include a summary of revisions in the annual report.
2.	Review and update, if needed, the standards outlined in the Sarpy County code and ORSDM for consistency with required performance standards as they relate to post-construction stormwater management plans.	<b>On-going All Years - Report</b> on any updates to the Sarpy County code or ORSDM.
3.	Maintain an online submittal and review process for site plans, easement and maintenance agreements, as built drawings, deed recordings and drainage studies.	<b>On-going All Years</b> - Report number of PCSMP projects and the status of their progress in the annual report.
4.	Develop SOPs for responding to complaints regarding Post Construction BMPs and a strategy for verifying BMPs are being installed & maintained in perpetuity.	<b>Year 1</b> - Submit SOPs with the annual report. <b>On-going All Years - Report</b> on any complaints and/or BMPs which have been certified as complete.
5.	Maintain a database that stores information on approved PCSMPs.	<b>On-going All Years</b> - Provide an inventory of certified stormwater control measures installed as part of the PCSMP requirements. Include a count of BMP types as well as any known changes to BMPs in the annual report.
6.	Inspect sites that are certified by the engineer of record and all sites identified as deficient on a complaint basis. Develop a protocol to bring sites in to compliance.	<b>Year 1</b> - Develop protocol for compliance assistance, and inspection strategy <b>On-going All Years</b> - Document and maintain inspection records of the certified PCSMP projects as identified in the strategy developed. Document any enforcement actions taken. Summarize activities in annual report.

**F. Pollution Prevention and Good Housekeeping**

<b>BMP#</b>	<b>SWMP Element Description</b>	<b>Target Goals &amp; Implementation Schedule</b>
1.	Maintain an inventory and map of municipal facilities. Review annually and update if needed.	<b>On-Going All Years</b> – Maintain an inventory and map of all municipal facilities.
2.	Conduct assessments of municipal maintenance facilities and review their municipal runoff control plans as applicable. Revise plans as needed if facilities expand or reduce activities and implement recommendations based on annual inspections.	<b>Year 1</b> – Develop a strategy to assess municipal facilities and prioritize them based upon a defined set of criteria, include strategy in the annual report. <b>Years 2 - 5</b> - Track the number of assessments for municipal facilities based upon the strategy developed in year 1. Include the number of assessments completed, a description of the assessment procedure and any changes in facilities ranking in the annual report.
3.	Continue to implement Good Housekeeping Program for municipal facilities that addresses “high-priority” facilities.	<b>On-Going All Years</b> – Annually report new, removed, or significantly updated municipal facilities
4.	Implement practices for maintaining the storm sewer system that includes catch basin maintenance, open channels and other drainage structures, street sweeping, and structural stormwater controls. All maintenance procedures are to be performed such that waste water and waste materials do not enter the MS4.	<b>Year 1:</b> Provide a description of the maintenance programs in the annual report. <b>On-Going All Years:</b> Annually report on Sewer Maintenance activities related to maintaining the storm sewer system and changes to any of the maintenance practices.
5.	Provide training for municipal employees in pollution prevention and good housekeeping.	<b>Year 1</b> - Develop a strategy for municipal employee training in pollution prevention and good housekeeping, include strategy in annual report. <b>On-Going All Years</b> – Conduct training events for municipal staff include number of employees trained, based on strategy developed in year 1, in annual report.
6.	Provide educational material to contractors hired to perform maintenance activities on the MS4.	<b>Year 1</b> - Develop materials to provide to contractors and include in the annual report. <b>Years 2 - 5</b> - Include in the annual report any new materials or updates to existing materials.