

Lawrence County & Others Storm Water Management Plan

Including: Fayette, Perry, Rome & Union

In accordance with
Ohio EPA NPDES General Permit No. OHQ000004
Facility Number OGQ00007*CG



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LAWRENCE COUNTY
STORM WATER MANAGEMENT PROGRAM PLAN

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Introduction and Background

Purpose

In compliance with the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et. Seq.) and the Ohio Water Pollution Control Act (Ohio Revised Code 6111), dischargers of storm water are authorized by the Ohio Environmental Protection Agency (Ohio EPA) from Small Municipal Separate Storm Sewer Systems (MS4) to discharge from the outfalls and to the receiving surface waters of the State in accordance with the conditions outlined in most recent the general permit issued by Ohio EPA (OHQ000004). This permit was issued on April 1, 2021 and expires on March 31, 2026.

The Board of Lawrence County Commissioners (BLCC) is a permittee under the MS4 program. In addition, four (4) (Rome, Union, Perry, Fayette) are Co-Permittees with the Board of Lawrence County Commissioners. The Lawrence County MS4 program is administered by the Lawrence Soil and Water Conservation District. MS4s within the municipal co-permittees are owned and operated by each jurisdiction.

As the MS4 permittee, the general permit requires each permittee to develop stormwater management programs (SWMP) plans designed to reduce the discharge of pollutants from the municipal separate storm sewer systems (MS4) to the maximum extent practicable (MEP) while also improving stream and water quality and protecting the health and welfare of the public. Additionally, these SWMPs must include measurable goals and implement needed stormwater management controls. These goals and controls are to be designed to reduce the discharge of pollutants to the MEP.

Lawrence County and its co-permittees are required by the Ohio EPA General Permit to “develop, implement, and enforce an SWMP designed to reduce the discharge of pollutants from your small MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Ohio Revised Code (ORC) 6111 and the Clean Water Act,” (Part III.A.1). Resultantly, “The SWMP should include management practices; control techniques and system, design, and engineering methods; and shall be modified to include provisions as Ohio EPA determines appropriate after its review of the program for the control of such pollutants,” (Part III.A.1).

Part III.B of the NPDES Permit requires that Lawrence County and Others implement six minimum control measures (MCM) which are to be included and outlined in the SWMP. The six MCMs are:

- 1) Public Education and Outreach
- 2) Public Involvement/Participation
- 3) Illicit Discharge Detection and Elimination (IDDE)
- 4) Construction Site Storm Water Runoff Control
- 5) Post-Construction Storm Water in New Development and Re-development
- 6) Pollution Prevention/Good Housekeeping for Municipal Operations

In order to facilitate coordination and cooperation, the Lawrence Soil and Water Conservation District has been designated lead agency in implementing Lawrence County and Others' SWMP. The National Pollutant Discharge Elimination System (NPDES) permit number OHQ000004, effective April 1, 2021.

Urban stormwater management looks to address the following causes of water degradation: soil erosion and sediment control; home sewage treatment system failure and mismanagement; channelization and stream alterations; runoff from parking lots, development, and roads; the retention and conservation of riparian areas fertilizer and pesticide use; and household hazardous waste and illegal dumping, open dumping and open burning

Community Description

The Storm Water Management Plan (SWMP) covers only 1/8 of Lawrence County along the Ohio River. The overall population of the County is 58,855 based on the 2021 Census. Population in the urbanized area is around 7,000 people. There are 13.6 sq/ miles in the urbanized area.

MS4 General Setting:

- Lawrence County is situated near the southern tip of Ohio in the eastern end of the County bordering the Ohio River. This area encompasses four (4) County Townships, namely: Perry, Fayette, Union and Rome (See map page 105). The 4 Villages (Althalia, Proctorville, Chesapeake South Point) are not included in this County SWMP as each is independently responsible for meeting the MS4 regulation on its boundaries.
- **Ohio River**
The river is 891 miles long from Pittsburg, PA to Cairo, IL where it confluences with the Mississippi River, and our MS4 section of the River is 30.7 miles long from River Mile 291.5 to River Mile 322.2 (River Miles are measured downstream from Pittsburgh by the Corps of Engineers). In our area the Drainage Area is 55,900 sq. miles (35,800,000 acres) and the stream is about 0.4 miles wide and 30' deep. The River's Navigation Stage is Elevation 515 (mean sea level) as controlled by the Greenup Lock & Dam located at River Miles 341.0. Check with Army Corp. of Engineers for 401 permit guidelines.
- **Climate**
The climate is moderate, average temperature is 35° F in winter and 75° F in summer. Total annual precipitation is about 42: with about 24" fall in April thru September. Average annual snowfall is about 16". Average relative humidity in midafternoon is around 60 percent. The sun shines 60% of the time possible in summer and 35% in winter. Prevailing wind is from the south. Average wind speed is highest (11mph) in spring.
- **Geology/Soils**
The geology is primarily Elkinsville Silt Loam which is typically well drained and nearly level. Permeability is slow to moderate (0.06" – 2.0"/hr.) and runoff is slow to medium. Information provided on USDA, web soil survey.

- **Flooding**

Flooding is a severe hazard along the Ohio River and its larger tributaries. The area is subject to flooding from both the river and from flash flooding on the tributaries. The Flood of Record occurred in 1937 when flood waters reached about 40' above today's normal river elevation, at that time getting into the 2nd stories of downtown businesses in Huntington. Many structures in Proctorville were inundated above the 2nd story. It took 12 days for the flood waters to reach their crest, and they were out of their banks for more than one week. This flood was the impetus for Congressional action that initiated a National Flood Control Program. Since then the Corps of Engineers has constructed levees and upstream reservoirs which have reduced the flood threat from the river.

There are several tributary streams in the MS4 area; the largest are Indian Guyan Creek and Symmes Creek. There are no flood control structures on these streams, however, the reduction of flood flows on the Ohio River and upstream reservoirs provides a limited added level of protection in the MS4 boundaries except for localized storms which can cause flash flooding. Further, floodplain laws prevent construction, floodproofing or flood prone structures, in the 100-year floodplain (i.e., those which have a 1% chance of occurring in any one-year period).

- **Archaeology**

For thousands of years, Native American Indians used the river for transportation, trading and fishing and the floodplains for farming, hunting, and living, leaving many artifacts and making it a Mecca for today's Archeology studies. The first Europeans to see the river were French Traders in 1669. The river was a primary transportation route for pioneers during westward expansion of the early US. The MS4 area is a prime source for archeological artifacts. A recent improvement of State Route 7 through Proctorville was delayed for numerous years while archeologist recovered artifacts that were uncovered by the road construction.

- **Environmental**

Any construction in the MS4 area must address the potential for adversely affecting the environment, specifically environmentally sensitive habitats and historical properties. In this MS4 area, those most likely are wetlands, endangered plants, endangered bats, threatened and endangered mussels in the river, and old homestead or business buildings. A complete list of Lawrence County environmental species, including those that are endangered or threatened may be found on the Ohio DNR website. It is noteworthy that the Corps of Engineers has special operational procedures at Robert C. Byrd Lock and Dam (River Mile 279.2) regarding endangered mussels.

Limitations of the SWMP Plan

The activities outlined in this plan guide the Lawrence County Stormwater Management Program toward implementing a comprehensive program that not only meets minimum permit requirements, but also results in improvements to water quality within the MS4 area.

The audience of this plan is elected officials, township and county agency staff, Ohio EPA and the general public. Whenever possible, the language and format of the plan is written and intended for a broad audience. To understand the specifics of the MS4 stormwater general permit, interested parties need to read the most current permit (OHQ000004 as of April 1, 2021).

Closing Comments

It is the intent of Ohio's Small MS4 NPDES Permit program that communities develop a program to address their stormwater management needs. In order to develop this SWMP, Lawrence County has carefully considered the various geographic, hydrologic, and demographic characteristics of Lawrence County and its partner townships. It is recognized by this SWMP that a comprehensive and holistic stormwater program will benefit the quality of life and sustainability of our communities, all while meeting state and federal requirements

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Minimum Control Measure 0 – Storm Water Program Operation/Administration

Introduction

You shall develop, implement, and enforce an SWMP designed to reduce MCM 0 the discharge of pollutants from your small MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of Ohio Revised Code (ORC) 6111 and the Clean Water Act. The SWMP should include management practices; control techniques and system, design, and engineering methods; and shall be modified to include provisions as Ohio EPA determines appropriate after its review of the program for the control of such pollutants. (Part III.A.1)

“You may partner with other small MS4s to develop and implement your SWMP. You may become Co-Permittees with one or more small MS4s by jointly submitting an NOI and including a Co-Permittee NOI for every additional small MS4. Your SWMP shall clearly describe which permittees are responsible for implementing each of the control measures. (Part I.D.2) Implementation of one or more of the minimum measures may be shared with another entity, or another entity may fully implement the measure on your behalf.” (Part III.C)

Lawrence County provides administrative and operational services necessary to meet permit requirements. These services include development and implementation of the SWMP and its associated programs; preparation of policy and procedural documents; permit compliance activity collection, evaluation, and reporting; recordkeeping and documentation; and coordination of permit compliance activities among Partner Agencies and Co-Permittees.

The following four program areas meet the requisite permit requirements:

Program Area 0-1: Program and Policy Development

Define, review, and update the Storm Water Management Program (SWMP); prepare and update regulations; and develop supporting policies, protocols, and guidance.

Program Area 0-2: Activity Tracking, Reporting, and Recordkeeping

Develop and implement a permit compliance activity tracking program; evaluate progress towards meeting measurable goals and performance standards; report permit compliance activities to Ohio EPA; and establish and maintain recordkeeping practices.

Program Area 0-3: Financial Management

Develop annual budgets and billing files, and account for costs

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Program Area 0-4: Coordination

Maximize cost-effective compliance through routine interaction among Partner Agencies and Co-Permittees.

Program Area 0-1: Program and Policy Development

Purpose

Define, review, and update the Stormwater Management Program (SWMP) Plan; prepare and update regulations; and develop supporting policies, protocols, and guidance.

Responsible Party/Implementation Partner(s) (Part III.A.1.d)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
0-1a	Maintain Storm Water Management Program (SWMP) Plan	<ul style="list-style-type: none"> • Maintain existing SWMP • Conduct annual review • Perform updates as necessary to meet new permit requirements 	County	Co-Permittees
0-1b	Maintain Regulations	<ul style="list-style-type: none"> • Establish and implement regulations; revise as necessary 	County	Co-Permittees
0-1c	Maintain Policies and Protocol	<ul style="list-style-type: none"> • Develop and implement policies and protocol; revise as necessary 	County	Co-Permittees

Legal Authority Limitations:

Program Elements

The following program elements are established in order to meet MS4 permit requirements and performance standards:

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Best Management Practices

The MS4 General Permit requires Lawrence County to create and maintain a SWMP that should include. Best Management Practices (BMPs) that you or another entity will or already implements for each storm water minimum control measurable goal. (Part III.A.1)

The MS4 General Permit states that you shall update your SWMP to be consistent with requirements of this permit within one year of the effective date of this permit April 1, 2022. (Part III.A.2)

The MS4 General Permit also requires that you shall do an annual review of your SWMP you may change your SWMP during the life of the permit to add components, controls, or requirements; or replace an ineffective or infeasible BMP. Ohio EPA may require changes to the SWMP as needed. (Part III.D)

The following best management practices and associated strategies and mechanisms are established:

BMP 0-1a Maintain Storm Water Management Program (SWMP) Plan

Lawrence County will maintain a SWMP-Task Force Meeting MS4 permit requirements. Lawrence County will review and update the SWMP on an annual basis – in response to required changes by Ohio EPA and to accommodate new BMPs or replacement of ineffective or infeasible BMPs –following procedures outlined in the permit.

BMP 0-1b Maintain Regulations

Development and implementation of ordinances or regulations are required for MCMs 3 through 5. The County has adopted, through passage of a resolution by the Board of Lawrence County Commissioners (BLCC), the following regulations:

- Soil Erosion and Sedimentation Control Regulations (MCM 4 and MCM 5)
- Grading and Earthwork Rules (MCM 4)
- Floodplain Management Regulations (MCM 4 and MCM 5)

County adoption automatically includes Co-Permittees (4 townships, Fayette, Perry, Rome & Union). Adopt regulations through ordinance or resolution. Regulations are subject to amendment(s) to accommodate future permit requirements.

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BMP 0-1c Maintain Policies and Protocol

To meet permit requirements and assist in consistent SWMP implementation, Lawrence County has also developed, and will review and update as needed, the following protocols and processes to guide the implementation of this SWMP:

- Illicit Discharge Detection and Elimination Program (IDDEP) Plan (MCM3): The IDDEP plan includes standard protocols for MS4 mapping; home sewage treatment system (HSTS) mapping, inspections, and orders to repair/replace; prioritizing and performing dry weather field screening of outfalls; and investigation and elimination of illicit discharges.
- Construction SWP3 Plan Review, Approval, and Documentation (MCM4): A process is in place for screening plans for applicability, reviewing and approving applicable plans, and documenting the use of a standardized plan review checklist.
- Post-Construction SWP3 Plan Review, Approval, and Documentation (MCM5): A process is in place for screening plans for applicability, reviewing and approving applicable plans, and documenting the use of a standardized plan review checklist.
- Construction Site Inspection and Enforcement (MCM4): A process is in place for site inspections using a standardized checklist. An enforcement escalation protocol exists and is used when necessary.
- Post-Construction Inspection and Enforcement (MCM5): A process is in place for final installation inspections and long-term monitoring inspections using standardized checklists. An enforcement escalation protocol exists and is implemented when necessary.
- Facility Storm Water Management Plans (MCM6): The County has created standardized forms documenting MS4 facility operation and maintenance activity protocols and routine facility assessments to assess whether protocols are being implemented.

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Best Management Practice (BMP), Measurable Goals, Milestones, and Evaluation Methods

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs. (Part III.A.1.c)

Best Management Practice (BMP), Measurable Goals, Milestones, and Evaluation Methods (Part III.A.1.c)		
BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 0-1a Maintain Storm Water Management Program (SWMP) Plan		
Monitor and revise as needed	On-Going	<ul style="list-style-type: none"> • Conduct formal annual program implementation reviews using protocols for developing annual reports and budgets
Update to meet new permit requirements	On-Going	<ul style="list-style-type: none"> • Verify updated SWMP meets new permit requirements
BMP 0-1b Maintain Regulations		
Develop and adopt regulations	On-Going	<ul style="list-style-type: none"> • Review existing regulations as new permit requirements are released • Identify necessary updates
BMP 0-1c Maintain Policies and Protocol		
Develop and maintain policies and protocol to meet program needs	On-Going	<ul style="list-style-type: none"> • Review existing policies and protocols once per year • Identify changes in program implementation and lessons learned

Rationale and Decision Process (Part III.A.1.e)

The rationale and decision process used to develop this program area include:

- Permit sections III.B.3.d., III.B.3.i, ii., III.B.4.b.i., and III.B.5.e.v., and III.B.5.f.i. require adoption of specific regulatory mechanisms for MCM3, MCM4, and MCM5. Regulation development and adoption met all County local legal and procedural requirements.
- Development and implementation of established protocols and processes help the County meet permit requirements.
- Development and implementation of established protocols and processes encourages County-wide consistency in performing its activities.

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- These regulatory mechanisms, policies, and protocols are in place, have been effective, and will continue.

Rationale for Program Modifications

The Policy and Protocol Development BMP was added to meet the MS4 permit requirements and performance standards:

Program Area 0-2: Activity Tracking, Reporting, and Recordkeeping

Purpose

Develop and implement a permit compliance activity tracking program; evaluate progress towards meeting measurable goals and performance standards; report permit compliance activities to Ohio EPA; and establish and maintain record-keeping practices.

Responsible Party/Implementation Partner(s) (Part III.A.1.d)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
0-2a	Track Program Activities	<ul style="list-style-type: none"> • Develop standardized reporting protocols and forms • Manage program data • Maintain data and document management applications • Document permit compliance activities and evaluate progress towards meeting goals 	County	Co-Permittees, Partner Agencies
0-2b	Report Program Activities	<ul style="list-style-type: none"> • Develop permit compliance report for Ohio EPA 	County	
0-2c	Keep Records	<ul style="list-style-type: none"> • Retain key documents following retention requirements in the permit 	County	Co-Permittees, Partner Agencies

Legal Authority Limitations: None

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Program Elements

The following program elements are established to meet MS4 permit requirements and performance standards:

Best Management Practices

BMP 0-2a: Activity Tracking

The MS4 General Permit requires the County *to* “... evaluate program compliance, the appropriateness of identified BMPs, and progress toward achieving identified measurable goals and satisfying performance standards.” (Part IV.A.1) The County, its partner agencies, and Co-Permittees will track and evaluate permit compliance activities to demonstrate progress towards achieving measurable goals and meeting performance standards. Activity tracking and evaluation mechanisms include:

- Development of standardized reporting protocols and forms.
These forms and their use are described in the Annual Report Development Protocol. Forms will be modified as needed to accommodate new reporting requirements.
- Manage program activity data and maintain data management applications.
The County manages permit compliance activity data in multiple formats including MS-Excel, applications. The data storage format is dictated by the type of permit compliance activity. The MS4 mapping and IDDE field screening program uses GIS-based systems.
- Track permit compliance activities.
The County, Partner Agencies, and Co-Permittees track permit compliance data throughout the year. Requests for permit compliance activity are requested to Partner Agencies and Co-Permittees once a year in preparation for development of the annual report.
- Evaluate permit compliance activities.
Information obtained from completed reporting forms is compiled and evaluated to assess progress towards program goals and meeting permit requirements.

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BMP 0-2b Report Program Data

The MS4 permit requires the County to submit an annual report by the first day of April for each year. Your report should include a Table of Organization, status of compliance, specific annual reporting requirements, activities you plan to undertake during the next reporting cycle. Proposed changes to your SWMP, (and) any variances granted. (Part IV.C)

The County will submit an annual report to Ohio EPA by the annual deadline of April 1st using the reporting method.

BMP 0-2c Recordkeeping

The MS4 permit requires the County to retain copies of all reports and documents for at least three years or the term of this permit, which ever is longer. You shall make your records available to the public if requested. (Part IV.B.1.2)

The County will retain copies of the annual reports, data used to demonstrate permit compliance, and other documents, including NOIs, as required under the permit. These documents are available to the public and Ohio EPA on request.

Key documents, including regulations and policies, annual reports, and public meeting notices will be posted on the Lawrence Soil and Water Conservation District website at www.lawrenceswcd.com.

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Best Management Practice (BMP), Measurable Goals, Milestones, and Evaluation Methods (Part III.A.1.c)

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs”.

Best Management Practice (BMP), Measurable Goals, Milestones, and Evaluation Methods (Part III.A.1.c)		
BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 0-2a Activity Tracking		
Development of standardized reporting protocols and forms	On-Going	<ul style="list-style-type: none"> Reporting forms are reviewed each year and updated as necessary to accommodate new reporting requirements
Manage program activity data and maintain data management applications.	On-Going	<ul style="list-style-type: none"> Data sources are reviewed annually in preparation for development of the annual report
Track permit compliance activities.	On-Going	<ul style="list-style-type: none"> Reviews during preparation of the annual report
Evaluate permit compliance activities	On-Going	<ul style="list-style-type: none"> Permit compliance data is reported and compiled once a year to assess progress towards meeting permit requirements Methods for collecting, compiling, and evaluating permit compliance activity data follows established protocols
BMP 0-2b Report Program Data		
Develop permit compliance report for Ohio EPA	Annual	<ul style="list-style-type: none"> Tracked and reported compliance activity data is compared against annual Ohio EPA reporting metrics
BMP 0-2c Recordkeeping		
Retain key documents following permit requirements	On-Going	<ul style="list-style-type: none"> Periodic reviews of the document management system and website are performed to assess remaining retention times for key documents

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Rationale and Decision Process (Part III.A.1.e)

The rationale and decision process used to develop this program area include:

- Permit compliance activity tracking by the County, its Partner Agencies, and Co-Permittees, provides the information for deriving performance metrics in the annual report.
- A coordinated activity tracking approach is necessary to assess permit compliance over many program components across Co-Permittee jurisdictions.
- Standardized activity tracking and reporting forms provide consistency across multiple agencies and Co-Permittee communities
- An organized recordkeeping system simplifies making County compliance documents available
- Established protocols for tracking and reporting permit compliance activities are being successfully implemented.

Rationale for Program Modifications

New permit requirements for document retention.

Program Area 0-3: Financial Management

Purpose

Manage the financial resources of the MS4 program.

Responsible Party/Implementation Partner(s) (Part III.

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
0-3a	Develop Budget	<ul style="list-style-type: none"> • Estimate coming year revenues and expenditures 	County	
0-3b	Develop Stormwater Fee Assessment Roll	<ul style="list-style-type: none"> • Develop annual Stormwater Fee Assessment Roll 	County	
0-3c	Account for Costs	<ul style="list-style-type: none"> • Monitor finances 	County	
0-3d	Pursue grants and loans	<ul style="list-style-type: none"> • Consider outside funding sources if necessary 	County	Co-Permittees, Partner Agencies

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Legal Authority Limitations:

Program Elements

The following program elements are established in order to meet MS4 permit requirements and performance standards:

Best Management Practices

The County MS4 program is organized under Ohio Revised Code (ORC) 6117 which has requirements related to financial management:

- The board may fix reasonable rates and charges to be paid by any person or public agency owning or having possession or control of any properties that are connected with, capable of being served by, or otherwise served directly or indirectly by, drainage facilities owned or operated by or under the jurisdiction of the county. In addition, the board may fix the rates and charges to pay the costs of complying with the requirements of phase II of the storm water program of the national pollutant discharge elimination system established in 40 C.F.R. part 122 . . . All moneys collected as drainage rates, charges, or penalties in or for any sewer district shall be paid to the county treasurer and kept in a separate and distinct drainage fund established by the board to the credit of the district. (ORC 6117.02(D))
- A board of county commissioners may adopt a cost allocation plan that identifies, accumulates, and distributes allowable direct and indirect costs and that prescribes methods for allocating those costs. (ORC 6117.02(E))
- The (cost allocation) plan shall conform to United States Office of Management and Budget Circular A-87, “Cost Principles for State, Local, and Indian Tribal Governments. (ORC 6117.02(E))

The following BMPs and associated strategies and mechanisms are established for this program area.

BMP 0-3a: Develop Budget

The County does not have a Stormwater Budget currently in place.

BMP 0-3b: Develop Stormwater Fee Assessment Roll

The County does not have a Stormwater Fee currently in place.

BMP 0-3c: Account for Costs

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At this time the County has no cost associated with this permit in place.

BMP 0-3d: Pursue Grants and Loans

The County, Co-Permittees, or Partner Agencies may pursue grants, loans, and/or other funding sources as allowed under their respective authorities. Such supplemental sources of revenue may be pursued on an as-needed basis at the discretion of the County, Co-Permittees, or Partner Agencies.

Best Management Practice (BMP), Measurable Goals, Milestones, and Evaluation Methods

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs..

Best Management Practice (BMP), Measurable Goals, Milestones, and Evaluation Methods (Part III.A.1.c)		
BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 0-3a: Develop Budget		
Meet OMB /Auditor Deadlines	N/A	• Internal quality control review
BMP 0-3b: Develop Stormwater Fee Assessment Roll		
Meet Auditor Deadlines	N/A	• Internal quality control review
BMP 0-3c: Account for Costs		
Monitor costs in relation to budget	On-Going	• Monitor Expenditures
BMP 0-4d: Pursue Grants and Loans		
Assess alternative funding sources	N/A	• Monitor potential funding sources for MS4 programs via Federal and State sources

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Rationale and Decision Process (Part III.A.1.e)

The rationale and decision process used to develop this program area include:

- Effective storm water management requires governmental services that protect the health, safety, and welfare of Lawrence County residents.
- Many governmental agencies, directly or indirectly, provide necessary storm water services.
- A cost allocation methodology and fee structure is not instated at this time but will possibly be considered over the next five year to meet ORC 6117 requirements and provide the revenue necessary to provide MS4 program services.
- Lawrence County and Lawrence County Engineer services to meet regulatory requirements are most cost effectively provided by having the County only perform activities that are not currently performed by another government agency.
- Development of annual budget.

Rationale for Program Modifications

The Financial Management BMP was established in order to meet MS4 permit requirements and performance standards:

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Program Area 0-4: Coordination

Purpose

Maximize cost-effective compliance through routine interaction among Partner Agencies and Co-Permittees

Responsible Party/Implementation Partner(s) (Part III.A.1.d)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
0-4a	Coordinate with Co-Permittee jurisdictions	<ul style="list-style-type: none"> Respond to Co-Permittee requests 	County	Co-Permittees
0-4b	Coordinate with Other Task Force Committee	<ul style="list-style-type: none"> Hold quarterly meetings with Task Force Committee. 	County	Co-Permittees
0-4c	Coordinate with Partner Agencies	<ul style="list-style-type: none"> Keep in contact with Partner Agencies on a need basis to coordinate record information 	County	Partner Agencies

Legal Authority Limitations: None

Program Elements

The following program elements are established in order to meet MS4 permit requirements and performance standards:

Best Management Practices

The following best management practices (BMPs) and associated strategies and mechanisms are established.

BMP 0-4a: Coordination with Co-Permittee Jurisdictions

The County will coordinate activities with the co-permittees (Townships and provide assistance, guidance,

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and training to the co-permittees). Assistance can include:

- Training for Co-Permittee staff to meet permit requirements,
- Provision of guidance documents and other materials needed to implement MS4 programs,
- Assistance in implementing MS4 regulations, and
- Response to inquiries.

BMP 0-4b: Coordinate with Task Force Committee

The County will coordinate at quarterly meetings with Co-Permittees, Partner Agencies, when necessary to obtain feedback on the MS4 program and to consider changes to the MS4 program.

BMP 0-4c: Coordinate with Partner Agencies

Implementation of one or more of the minimum measures may be shared with another entity, or the entity may fully take over the measure. You may rely on another entity only if you have a Memorandum of Understanding signed agreeing. There shall be written acceptance of this obligation (Part III.C).

Provision of MS4 services is implemented through a Memorandum of Understanding (signed March 19, 2019), with Partner Agencies to leverage existing services for permit compliance. Permit compliance activities to be performed by each agency and consultant are established in the memorandum of understanding. Formal Storm Water Task Force meeting is held at a quarterly meeting to assess progress towards permit compliance and develop opportunities to coordinate activities.

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Best Management Practice (BMP), Measurable Goals, Milestones, and Evaluation Methods

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs. (Part III.A.1.c).

Best Management Practice (BMP), Measurable Goals, Milestones, and Evaluation Methods (Part III.A.1.c)		
BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 0-4a Coordination with Co-Permittee Jurisdictions		
Respond to Jurisdiction Requests	On-Going	<ul style="list-style-type: none"> Track response to requests
BMP 0-4b Coordinate with Other Stakeholders		
Respond to Task Force Committee Requests	On-Going	<ul style="list-style-type: none"> Track response to requests
BMP 0-4c Coordinate with Partner Agencies		
Provide mechanisms for coordination of Partner Agency activities	On-Going	<ul style="list-style-type: none"> Track Partner Agency coordination meetings and prepare meeting summaries Track progress on tasks identified during Partner Agency meetings

Rationale and Decision Process

The rationale and decision process used to develop this program include:

- The Lawrence County MS4 program was created to provide storm water services to its Co-Permittee jurisdictions more cost-effectively than could be provided by each jurisdiction individually.
- Service delivery must be responsive to varying jurisdiction conditions and concerns.
- Multiple mechanisms achieve coordination with Co-Permittee jurisdictions at reasonable time commitment.
- Multi-agency service delivery requires coordination to achieve compliance at minimum cost.
- County can assist in developing solutions to water quality issues that transcend multiple jurisdictions.

Rationale for Program Modifications

The Coordination BMP was added to cover a program that is already in place and is being implemented.

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Minimum Control Measure 1 – Public Education and Outreach

Introduction

You shall implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff. (Part III.B.1.a)

Your storm water public education and outreach program, at a minimum, shall include: more than one outreach mechanism; a minimum of five storm water themes or messages over the permit term; your storm water public education and outreach program shall reach at least 50 percent of your population over the five year permit term.

The following five program areas establish the framework of public education and outreach within this current SWMP:

Program Area 1-1: Trash and Illegal Dumping, Open Dumping and Open Burning

- Hold several clean up events throughout the County during the year, promote Drug Take Back event, Tire Amnesty events, Hazardous Waste & Electronic events; promote the New Take Pride Initiative Program; Township cleanups and Promote Awareness of Open Dumping and Open Burning regulations and enforcement procedures in place and more.

Program Area 1-2: Education and Outreach Events

- Promote and provide educational opportunities and hands-on activities that encourage deeper understanding of stormwater pollution to K-12 students, and adults through county events such as fairs, annual meeting, public events, contests, etc.

Program Area 1-3: Mass Media

- Use traditional, internet, social, and hand print-based media to raise awareness across a broad audience about stormwater pollution.

Program Area 1-4: Maintenance of Home Sewage Treatment Systems (HSTS)

- Provide information on addressing proper operation and maintenance on HSTSs in Lawrence County through the Health Department.
- Promote WPCLF Water Pollution Control Programs- to help low income landowners to help upgrade, install or replace old outdated septic systems.

Program Area 1-5: Contractors/Developers Workshop

- Host bi-annual workshop for contractors/developers on Phase II requirement

Lawrence County Population Analysis

Performance Standard: Reach at least 50% of the population over the five-year permit term.

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The overall population of Lawrence County is estimated at 58,855 people from the 2021 U.S. Census. The population of the County that lives with in Lawrence County and Others’ small MS4 is estimated about 7,000 people, or 1/8 of Lawrence County along the Ohio River. While exact measurements of target audience exposure are at best an obscure estimate, the SWMP base measurement for reaching the 50% threshold of 7,000 residents over the five-year period. Breaking that number down per year, the required annual goal for the program is 1400 residents.

Program Area 1-1: Trash & Illegal Dumping, Open Dumping & Open Burning

Purpose

Promote and provide educational opportunities and hands on that encourage a deeper understanding of soil and water pollutants. Educate K-12 students, and adults through County events such as: fairs, annual meeting, public events, contest, etc.

Responsible Party/Implementation Partners

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
1-1a	Develop Media-based Outreach	<ul style="list-style-type: none"> Internet, social media, print media 	County	Partner agencies
1-1b	Develop Print-based Education & Outreach Program	<ul style="list-style-type: none"> Develop and distribute general awareness printed materials Promote Audience Involvement on Trash and Illegal dumping, Promote County Wide Clean up, household recycling Events 	County	Partner agencies
1-1c	Enforcement	<ul style="list-style-type: none"> Enforce Open Dumping and Open Burning Regulations 	County	Partner agencies

Legal Authority Limitations: None

Program Elements

The following program elements are established in order to meet MS4 permit requirements and performance standards.

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Best Management Practices

The permit requires the SWMP to describe your outreach strategy, including the mechanisms you will use to inform individuals and households about the steps they can take to reduce storm water pollution, become involved in the storm water program, and reach target audiences.

The following BMPs and associated strategies and mechanisms are established:

BMP 1-1a: Develop Outreach

The media-based outreach strategy employs multiple mechanisms through the year including:

- Internet: Develop and distribute educational materials through internet based platforms such as: websites, newsletters.
- Social Media – Develop and distribute educational materials on Facebook and advertise upcoming events such as: cleanup, public events, workshops, field days, etc.

The specific themes and audiences for materials developed and distributed each year under the media outreach program will be determined annually based on permit requirements, progress towards achieving measurable goals, effectiveness in prior years, and new opportunities for outreach.

BMP 1-1b: Develop Educational Materials for Public Events

The print-based outreach strategy is to distribute stormwater themed printed items, including brochures, fact sheets, and door hangers, to targeted audiences throughout the year. The programs outreach mechanisms include:

- Develop two new brochures or flyers annually and update current brochures to distribute on stormwater themed materials to the handed out to the general public at county fair, public events, office display, and more by partner agencies and Co-Permittees.
- Develop and distribute educational materials to businesses and residents during outfall field screenings, targeted business inspections, or responses to spills.
- Develop and distribute printed giveaway items at meetings and events.

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BMP 1-1c: Develop Educational Materials for Public Events

The outreach strategy includes the use of interactive tools to engage target audiences at events. The programs outreach mechanisms include:

- Develop or identify stormwater themed interactive tools promoting stormwater awareness.
- Incorporate stormwater themed interactive tools into public meetings and events.

Themes, Target Audiences (Part III.B.1.b.i, ii, iii, and iv)

The permit requires the stormwater plan to identify target audiences for your educational program ..Theme Promote and provide educational opportunities and hands on that encourage a deeper understanding of soil and water pollutants. Educate K-12 students, and adults through County events such as: County fair, annual meeting, public events, contests and much more, etc.

Such themes and their overall targets include:

- General- Overall awareness of stormwater systems and pollutant sources, introduction to illicit discharges/spills.
- Property Management- Lawn/landscaping, leaf collection, exterior maintenance, materials storage, pesticide/herbicideusage, pet waste, waste management and disposal, vehicle and equipment maintenance.
- Stormwater Controls- Proper design, operation and maintenance.
- Stream and Watershed Awareness- Identification of local waterways and watersheds, human activities impacting waterquality, mitigation opportunities
- Construction Projects- Earth disturbance, construction materials/wastes, sediment and erosion controls.
- Sustainable Landscaping and Urban Agriculture- Sustainable landscaping and agricultural practices in an urban environment.

Audiences that will be targeted for the program include:

- Residents- represent the predominant land use in Lawrence County and various residential.
- Businesses- often use pollutants in high quantities that, if not controlled, may become significant pollutants if not controlled.
- Property Owners- unique responsibilities to manage riparian areas of their properties in a manner that filters pollutants, stabilizes streambanks, and protects aquatic habitat.
- Development Community- requires education to properly and cost-effectively achieve permit requirements under Ohio EPA’s Construction General Permit (CGP) as well as under the small MS4 permit MCMs 4 and 5.

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- Co-Permittee Jurisdictions and MS4 Staff- play an important role in extending educational messages throughout their jurisdiction and also need to be educated about illicit discharges, improper disposal of waste, and pollution prevention under the MS4 permit.

Best Management Practice, Measurable Goals, Milestones, and Evaluation Methods (Part III.B.1.b.vii)

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs. The County will continue to pursue the measurable goals listed in the table below on an ongoing bases and evaluate compliance with these goals each year by tracking usage of each outreach mechanism and its content.

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 1-1a Develop Media-based Outreach		
Provide content for internet-based outreach Create and broadcast media-appropriate content	On-Going On-Going	<ul style="list-style-type: none"> • Tracking data is collected quarterly • Data is compiled and evaluated annually during preparation of the annual report using established protocols • Evaluate progress towards meeting 50% reach goal
BMP 1-1b Develop Print-based Education and Outreach Program		
Develop and distribute educational materials	On-Going	<ul style="list-style-type: none"> • Tracking data is collected annually • Data is compiled and evaluated annually during preparation of the annual report using established protocols • Evaluate progress towards meeting 50% reach goal
BMP 1-1c Develop Educational Materials for Public Events		
Develop interactive displays and content	On-Going	<ul style="list-style-type: none"> • Tracking data is collected annually • Data is compiled and evaluated annually during preparation of the annual report using established protocols • Evaluate progress towards meeting 50% reach goal

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Rationale and Decision Process (Part III.B.1.b)

The target audiences, on storm water pollution mechanisms, and strategies have been developed over several permit terms based on the following considerations:

- Residents, businesses, and their customers within Lawrence County are not generally knowledgeable about stormwater and its impacts.
- Frequent, varied messages delivered by a variety of media are needed to “reach” residents, business owners, and their customers.
- Raising public awareness and changing public behavior may take several generations; children are generally more open to receiving and acting on educational messages.
- Public will become more engaged as their awareness of stormwater increases, reducing long-term compliance costs.
- Internet-based and social media outreach, complemented by traditional media, is becoming a cost-effective mechanism for reaching a large, diverse audience.

Rationale for BMP Modifications

This program area and its associated BMPs related to traditional, internet, and social media, which has proven to be effective over the last permit term, will continue shifting focus towards internet and social media to reach a larger audience. Print-based media was integrated into Media-based Outreach program area as it has similar themes, target audiences, and targeted pollutants. Print-based media, which has proven to be effective in the past, is decreasing in applicability as the general public increasingly turns toward mass media, the internet, and social media for information. In recognition of this trend, and to maximize the effectiveness of the media outreach program, print-based media will continue but eventually integrated into internet and social media over the permit term.

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Program Area 1-2: Education and Outreach Events

Purpose

Provide a range of displays, presentations, and hands-on activities that promote a more in-depth understanding of stormwater pollution, its impacts, and its control.

Responsible Party/Implementation Partner(s) (Part III.B.1.b.vi)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
1-2a	Events for Residential and Public Audiences	<ul style="list-style-type: none"> Plan and implement education events and presentations Provide materials for events and presentations organized by others 	County	Partner Agencies
1-2b	Events for Development Community Audiences	<ul style="list-style-type: none"> Provide educational workshop for Contractors /Developers 	County	Partner Agencies

Legal Authority Limitations: None

Program Elements

The following program elements are established in order to meet MS4 permit requirements and performance standards.

Best Management Practices

The permit requires the SWMP to describe your outreach strategy, including the mechanisms you will use to inform individuals and households about the steps they can take to reduce stormwater pollution become involved in the stormwater program, and reach target audiences.

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The following BMPs and associated strategies and mechanisms are established:

BMP 1-2a: Events for Residential and Public Audiences

The County employs multiple strategies to identify, support, and implement events that will have the broadest impact on reducing the likelihood of targeted pollutants reaching local waterways via runoff over the permit term. There is some overlap of events with strategies for permit compliance under MCMs 4 through 6. This BMP involves the following mechanisms:

- Plan and implement live or virtual events that focus on target pollutants for residential and/or business audiences likely to have abroad impact on reduction of polluted runoff reaching local waterways.
- Promote relevant public education and outreach events and educational opportunities provided by third parties such as public agencies watershed organizations, and non-profits.
- Decide on an approach to be followed each year. Plan and implement accordingly.
- Perform an annual review of outreach events and make modifications as necessary for the coming year(s).

BMP 1-2b: Events for Development Community Audiences

The County employs multiple strategies to identify, support, and implement events that will have the broadest impact on reducing the likelihood of targeted pollutants reaching local waterways via runoff over the permit term. There is some overlap of events with strategies for permit compliance under MCMs 4 and 5. This BMP involves the following mechanisms:

- Provide the development community with education and training on erosion and sediment control requirements and practices, post-construction controls, and construction site waste management.
- Develop and present training to the development community on post-construction controls once per permit term.

Themes, Target Audiences (Part III.B.1.b.i, ii, iii, and iv)

The permit requires the stormwater plan to identify target audiences for your educational program who are like to have significant storm water impacts and to target pollutant sources your public education program is designed to address over the five -year permit term.

Such themes and their overall targets include:

- General: Overall awareness of stormwater systems, pollutant sources and controls, and introduction to illicit

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discharges/spills and impacts on waterways.

- Property Management: Lawn/landscaping, leaf collection, exterior maintenance, materials storage, pesticide/herbicide usage, pet waste, waste management and disposal, vehicle and equipment maintenance.
- Pavement Maintenance: Deicing, road maintenance, street cleaning, street/parking lot/sidewalk maintenance.
- Stormwater Controls: Proper design, operation, and maintenance.
- Stream and Watershed Awareness: Stream and watershed protection.
- Construction Projects: Earth disturbance, construction materials/wastes, sediment and erosion control, post-construction controls.
- Sustainable Landscaping and Urban Agriculture: Sustainable landscaping and ag practices in urban environments.

Audiences that will be targeted for this program include:

- Residents: represent the predominant land use in Lawrence County and various residential activities may be significant pollutant sources if not controlled.
- Businesses: often use pollutants in high quantities that, if not controlled, may become significant pollutant sources and have the potential to become illicit discharges.
- Development Community: requires education related to proper sediment and erosion controls at construction sites and to properly design, install, and maintain pollution controls to cost-effectively achieve permit requirements under Ohio EPA'S CGP, as well as under the MS4 permit MCMs 4 and 5.

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Best Management Practice, Measurable Goals, Milestones, and Evaluation Methods (Part III.B.1.b.vii)

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs. The County will continue to pursue the measurable goals listed in the table below on an ongoing basis and evaluate compliance with these goals each year by tracking usage of each outreach mechanism and its content.

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 1-2a: Events for Residential and Public Audience		
Hold events or presentations/ booths, displays, interactive activities	On-Going	<ul style="list-style-type: none"> • Tracking data is collected quarterly • Data is compiled and evaluated annually during preparation of the annual report using established protocols • Evaluate progress towards meeting 50% reach goal
Provide stormwater themed information to events organized by others	On-Going	
BMP 1-2b: Events for Development Community Audiences		
Educate development community regarding erosion and sediment controls, post-construction controls, and stream corridor protection	On-Going	<ul style="list-style-type: none"> • Tracking data is collected annually • Data is compiled and evaluated annually during preparation of the annual report using established protocols • Evaluate progress towards meeting 50% reach goal

Rationale and Decision Process (Part III.B.1.b)

The targeted audiences, mechanisms, and strategies have been developed over several permit terms based on the following considerations:

- Residents, businesses, and developers within Lawrence County are not generally knowledgeable about stormwater and its impacts.
- Individual events provide an opportunity to focus on stormwater related issues and impacts.
- Audience-specific events focusing on pollutants.
- A knowledgeable public is more likely to become engaged in stormwater-related actions.
- Educating and engaging the public increases the likelihood that spills that threaten local waterways be reported to the County EMS or Local Fire Departments immediately.

Rationale for BMP Modifications

Education of the development/construction community is now emphasized as the small MS4 permit also focuses on implementation of the Ohio EPA Construction General Permit.

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Program Area 1-3: Mass Media

Purpose

Use traditional, internet, social, and print-based materials such as newsletters, brochures to raise awareness across a broad audience about stormwater pollution.

Responsible Party/Implementation Partner(s) (Part III.B.1.b.vi)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
1-3a	Develop Outreach Media based	<ul style="list-style-type: none"> Internet, social media, newsletter, print materials 	County	Partner Agencies
1-3b	Develop Education Program -Print based	<ul style="list-style-type: none"> Develop & distribute general awareness printed materials Develop and distribute printed materials to property owners at public events 	County	Partner Agencies
1-3c	Develop Educational Materials for Public Events.	<ul style="list-style-type: none"> Develop and use interactive educational tools at public events. 	County	Partner Agencies

Legal Authority Limitations: None

Program Elements

The following program elements are established in order to meet MS4 permit requirements and performance standards.

Best Management Practices

Raising Public Awareness and changing public behavior locally takes several generations.

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The following BMPs and associated strategies and mechanisms are established:

BMP 1-3a: Develop Media-based Outreach

The media-based outreach strategy employs multiple mechanisms through the year, including

- Internet: Develop and distribute educational materials through internet-based platforms such as websites, online advertising, and targeted email.
- Social Media: Develop and distribute education materials through Facebook and other social media platforms as they emerge.

The specific themes and audiences for materials developed and distributed each year under the media will be determined annually based on permit requirements, progress towards achieving measurable goals, effectiveness in prior years, and new opportunities for outreach.

BMP 1-3b: Develop Print-based Education and Outreach Program

The print-based outreach strategy is to distribute stormwater themed printed items, including brochures, fact sheets, to targeted audiences through the year. The programs outreach mechanisms include:

- Develop and distribute stormwater themed printed materials to the general public by partner agencies and Co-Permittees
- Develop and distribute educational materials to businesses and residents during outfall screenings, responses to spills by partner agencies.
- Develop and distribute printed giveaway items at meeting and events.

BMP 1-3c: Develop Educational Materials for Public Events

The outreach strategy includes the use of interactive tools to engage target audiences at events. The programs outreach mechanisms include:

- Develop or identify stormwater theme interactive tools promoting stormwater awareness.
- Incorporate stormwater themed interactive tools into public meetings and events.

Themes, Target Audiences (Part III.B.1.b.i, ii, iii, and iv)

The permit requires the storm water plan to identify target audiences for your educational program who are likely to have significant storm water impacts over the five-year permit term.

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Such themes and their overall targets include:

- General: Overall awareness of stormwater systems, pollutant sources, and practices to control; introduction to illicit discharges/spills.
- Property Management: Lawn/landscaping, leaf collection, exterior maintenance, materials storage, pesticide/herbicide usage, pet waste, waste management and disposal, vehicle and equipment maintenance
- Stormwater Controls-Proper design, operation and maintenance
- Stream and Watershed Awareness: identification of local waterways, human activities impacting water quality.
- Construction Projects-Earth disturbance, construction materials/wastes. Sediment and erosion controls.

Audiences that will be targeted for this program include:

- Residents-represent the predominant land use in Lawrence County and various residential activities may be significant pollutant sources if not controlled.
- Businesses- often use pollutants in high quantities that, if not controlled, may become significant pollutant sources.
- Property Owners-unique responsibilities to manage riparian areas of their properties in a manner that filters pollutants, stabilizes streambanks, and protects aquatic habitat.
- Develop Community-requires education to properly and cost effectively achieve permit requirements under Ohio EPA's Construction General Permit (CGP) as well as under the small MS4 Permit MCMs 4 & 5.

Best Management Practice, Measurable Goals, Milestones, and Evaluation Methods (Part III.B.1.b.vii)

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs. The County will continue to pursue the measurable goals listed in the table below on an ongoing basis and evaluate compliance with these goals each year by tracking usage of each outreach mechanism and its content.

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BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 1-3a: Update Program Offerings		
Review/update classroom curriculum as necessary	On-Going	<ul style="list-style-type: none"> • Tracking data is collected annually • Data is compiled and evaluated annually during preparation of the annual report using established protocols • Evaluate progress towards meeting 50% reachable goal
Distribute materials as required	On-Going	
BMP 1-3b: Present to Students		
Conduct educational presentations; document presentations conducted	On-Going	<ul style="list-style-type: none"> • Tracking data will be collected annually • Data is compiled and evaluated annually during preparation of the annual report using established protocols • Evaluate progress towards meeting 50% reachable goal
BMP 1-3c: Present at Teacher Workshops		
Conduct educational presentations; document presentations conducted	On-Going	<ul style="list-style-type: none"> • Tracking data is collected annually • Data is compiled and evaluated annually during preparation of the annual report using established protocols • Evaluate progress towards meeting 50% reachable goal

Rationale and Decision Process (Part III.B.1.b)

The targeted audiences, pollutant sources, mechanisms, and strategies have been developed over several permit terms based on the following considerations:

- Raising public awareness and changing public behavior typically takes several generations.
- Students are typically more open to receiving and acting on educational messages.
- Students often relay what they have learned to their parents, broadening the outreach achieved.
- Integrating stormwater education into science curricula gains support of schools.
- Teachers who gain experience with stormwater curricula can continue such education with limited County support.

Rational for BMP Modifications

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This program area and its associated BMPs related to Maintenance of Home Sewage Treatment Systems(s) The County Health Department will promote a program to help low income residents upgrade, replace or alter their systems to help bring them up to meet code. Also, be responsible for new systems being installed in the County that their meeting new regulations. Target audience will be all residents in Lawrence County.

Program Area 1-4: Maintenance of Home Sewage Treatment Systems (HSTS)

Purpose

Located HSTS and their discharge points and manage them accordingly with applicable state laws and local regulations.

Responsible Party/Implementation Partner(s) (Part III.B.1.b.vi)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
1-4a	Map HSTS's	<ul style="list-style-type: none"> Maintain County HSTS inventory list (spreadsheet) Map HSTSs and the associated MS4 connections 	LCHD LSWCD	Co-Permittees
1-4b	Update HSTS Control Plan	<ul style="list-style-type: none"> Update and maintain the HSTS Illicit Discharge Plan 	COUNTY & LCHD	
1-4c	Screen HSTS	<ul style="list-style-type: none"> Inspect HSTSs for proper operation 	LCHD & LSWCD	
1-4d	Enforce HSTS Plan	<ul style="list-style-type: none"> Require the enforce order to either connect the sanitary sewer or repair/replace malfunctioning systems. 	LCHD	

Legal Authority Limitations: As the responsible party for this program area, Lawrence County Health Department is subject to Ohio Revised Code 3718 and Ohio Administrative Code 3701-29.

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

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Best Management Practices

The following BMPs and associated strategies and mechanisms are established for this program.

BMP 1-4a: Map HSTS

The permit requires a list of all on-site sewage disposal systems located within your jurisdiction and are connected or discharging to your small MS4. A storm sewer map showing the locations of all HSTSs connected or discharging to your small MS4 the type of conduits/ditches in your small MS4 HSTS Systems are maintained in the office in the following matter:

- The County maintains an inventory (excel spreadsheet) of HSTSs with Lawrence County urbanized areas.
- The County will maintain and updated a map of HSTSs and their discharge points within the County urbanized area. The map will include bodies of water discharges from the MS4, if funds are available.
- The HSTS map will be updated annually.
- The map will be updated on our website to be made available to the public.

BMP 1-4b Update HSTS Control Plan

The permit requires the County to establish priorities and specific goals for long-term system wide surveillance.

Working with the Lawrence County Health Department, the County will create a map to include locations of know HSTSs within the County boundaries. Through field inspections conducted by LCHD personnel inspectors and Lawrence SWCD will focus on hot spots as well as issues and complaints received at the LCHD.

- The County implements this surveillance program through partnership with the LCHD.

BMP 1-4c: Screen HSTSs

The permit includes three requirements for coordinating regulations of on-site sewage disposal systems:

- Proactively identify residences with existing individual discharging HSTSs that can be legally, feasibly, and economically connected to central sewers.
- Implement/enhance an existing operation and maintenance program which determines if existing discharging HSTSs are operating as designed and ...requires elimination, upgrade, or replacement.
- Evaluate the planned or possible future installation of sewers for areas which contain high densities of discharging HSTS.

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LCHD routinely inspects HSTSs with the County boundaries to determine whether these systems are operating as designed.

BMP 1-4d: Enforcement HSTS Plan

The permit states that if a contamination source has been identified as a discharging HSTS that is not operating as designed the permit requires the County to resolve the non-functioning must be brought up to code replacement with system does not discharge or allowing a replacement discharging HSTS when no other option is available. When a malfunctioning system is identified, the plan requires one of the following actions, in compliance with Ohio and Lawrence County Health Codes:

- Enforce order to repair malfunctioning HSTSs
- Enforce order to replace malfunctioning HSTSs
- Enforce order to connect to a sanitary sewer system, if available in the area.

Governed by the Ohio Revised Code and the Ohio Administrative Code, the Lawrence County Health Department enforces the orders to repair, replace, or connect malfunctioning HSTSs to a sewer system (if available) through its operation and maintenance (O&M) management for sewage treatment systems.

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 4-1a: Map HSTS		
Maintain HSTS list Map HSTSs and their MS4 connections	On-Going	• Review annually to assess progress as part of established workplan/budget and annual report development protocols
BMP 4-2b: Update HSTS Control Plan		
Update and maintain HSTS plan	On-Going	• Review annually to assess progress as part of established workplan/budget and annual report development protocols
BMP 4-3c: Screen HSTS		
Inspect HSTSs for proper operation	On-Going	• Review annually to assess progress as part of established workplan/budget and annual report development protocols
BMP 4-2d: Enforce HSTS Plan		
Require and enforce orders to connect to centralized sanitary sewer or repair/replace	On-Going	• Review annually to assess progress as part of established workplan/budget and annual report development protocols

Rationale and Decision Process (Part III.B.3.i)

The target audiences, mechanisms, and strategies have been developed over several permit terms based on the following

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considerations:

Nearly 50-100 (annually) HSTSs serve property owners within Lawrence County, most in areas not served by sanitary sewer systems. Of which possibly 5-10 are in the urbanized area. When properly operated, monitored, and maintained in accordance with LCHD regulations, HSTSs can be managed to minimize pollution to the receiving waters so they are not a significant pollution source. Because there is always some risk with discharging systems causing pollution, upgrades/updates or replacements are required when changing flow/waste strength to such systems or when substantial changes occur to the home. Existing HSTS inspection programs are a cost-effective way of detecting and eliminating illicit discharges in drainage catchments where HSTSs predominate.

Rationale for Program Modification

Enforcing an HSTS plan was the combination of previous measurable goals from the last permit.

Best Management Practice, Measurable Goals, Milestones, and Evaluation Methods (Part III.B.1.b.vii)

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs. The County will continue to pursue the measurable goals listed in the table below on an ongoing basis and evaluate compliance with these goals each year by tracking usage of each outreach mechanism and its content.

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 1-4a: Update Program Offerings		
Review/update classroom curriculum as necessary	On-Going	<ul style="list-style-type: none"> • Tracking data is collected annually • Data is compiled and evaluated annually during preparation of the annual report using established protocols • Evaluate progress towards meeting 50% reachable goal
Distribute materials as required	On-Going	
BMP 1-3b: Present to Students		

Legal Authority Limitations: None

Program Elements

The following program elements are established in order to meet MS4 permit requirements and performance standards.

Best Management Practices

The permit requires the SWMP to describe your outreach strategy, including the mechanisms you will use to inform individuals and

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Households about the steps they can take to reduce storm water pollution, become involved in the storm water program, and reach target audiences.

Program Area 1-5: Contractors / Development Workshop

Purpose

The following program elements are established to meet MS4 permit requirements and performance standards:

Responsible Party/Implementation Partner(s) (Part III.B.1.b.vi)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
1-5a	Contractor/Developers Work	<ul style="list-style-type: none"> Educate 	LCHD LSWCD	Co-Permittees

Legal Authority Limitations: None

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

The following BMPs and associated strategies and mechanisms are established:

BMP 1-5a: Host a Contractors / Development Workshop

The media-based outreach strategy employs multiple mechanisms through the year, including

- Internet: Develop and distribute educational materials through internet-based platforms such as websites, online advertising, and targeted email.

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- Social Media: Develop and distribute education materials through Facebook and other social media platforms as they emerge.

The specific themes and audiences for materials developed and distributed each year under the media will be determined annually based on permit requirements, progress towards achieving measurable goals, effectiveness in prior years, and new opportunities for outreach.

BMP 1-5a: Contractors / Development Workshop

- Have speakers from Ohio EPA
- Develop an agenda to discuss Post Construction
- Develop an agenda to reach construction site runoff

Themes, Target Audiences (Part III.B.1.b.i, ii, iii, and iv)

The permit requires the storm water plan to identify target audiences for your educational program who are likely to have significant storm water impacts our public education program is designed to address over the five-year permit term.

Such themes and their overall targets include:

Rationale for BMP Modifications

MCM 1 - Annual Reporting Requirements (Part III.B.1.c.v)
1. Identify each mechanism used and its storm water theme, target pollutant(s), its target audience and an estimate of how many people within your jurisdiction were reached by each mechanism

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Minimum Control Measure 2 – Public Involvement and Participation

Introduction

You shall comply with State and local public notice requirements and satisfy this Minimum Control Measure's minimum standard when implementing a public involvement/participation program. (Part III.B.2.a)

Your storm water public involvement/participation program, at a minimum, shall include: Four public involvement activities over the permit term if your small MS4 discharges to a watershed.

Your annual report shall identify each public involvement/participation activity conducted, including a brief description of the activity, and include an estimate of how many people from your jurisdiction participated.

The following four program areas establish the framework of public education and outreach within this current SWMP:

Program Area 2-1: Public Reporting

- Provide and promote effective communication between the public and the County to allow effective reporting of and response to potential stormwater problems.

Program Area 2-2: Public Involvement Activities

- Involve residents in activities which protect water quality or raise awareness of stormwater issues.

Program Area 2-3: SWMP Development and Implementation

- Provide mechanisms for public involvement in the development and implementation of the SWMP.

Program Area 2-4: Public Access to County Information

- Expand and maintain the County website as the central location for providing the public access to County regulatory compliance documents including the SWMP, County regulations, annual reports, public notices, and other County policy/plans/regulatory documents.

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Program Area 2-1: Public Reporting

Purpose

Provide and promote effective communication between the public and the County to allow effective reporting of and response to potential storm water problems.

Responsible Party/Implementation Partner(s) (Part III.B.2.b.v)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
2-1a	Respond to citizen complaints and inquiries	<ul style="list-style-type: none"> • Respond to inquiries received at County office • Respond to reported construction site issues • Respond to reported stream and watershed issues • Respond to inquiries from other reporting mechanisms (County or Partner websites) • Respond to Open Dumping and Open Burning Complaints and violations 	County	Partner Agencies

Legal Authority Limitations: None

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

Best Management Practices

The following BMPs and associated strategies and mechanisms are established:

BMP 2-1a: Respond to Citizen Complaints and Inquiries

The County & Lawrence Solid Waste considers the receipt and response to citizen complaints and inquiries to be an integral part of its program to detect non-storm water discharges, including illegal dumping, to your system. The County’s system to receive and respond to citizen complaints and inquiries also satisfies the permit requirement of procedures for receipt and consideration of information submitted by the public pertaining to construction sites. To provide opportunities for reporting of stormwater-related issues, the County will employ the following mechanisms:

- Respond to reported complaints and inquiries received at the County or Partner Agencies.

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- Respond to complaints and inquiries posted through reporting mechanisms on County and Partner Agency websites.
- Respond to reported stormwater-related issues that are reported through other mechanisms.

Target Audiences (Part III.B.2.b. iii)

- Residents: Familiar with the areas they live, work, and play, and are likely to generate a significant portion of reports of stormwater-related issues.
- Businesses and their Customers: Often use pollutants in high quantities and should be actively involved in reporting improper handling and disposal activities that can create significant pollutant sources.
- Property Owners: Located along water bodies within MS4 outfalls are uniquely situated to notice and report potential illicit discharges or activities that may impact water quality.
- Co-Permittees and Co-Permittee MS4 Facility Staff: Tend to be more aware of the impacts of stormwater on their communities and infrastructure- such as issues with their MS4 assets and localized flooding. The staff are frequently in the field performing other tasks and are a primary source of reporting for potential illicit discharges and spills. Township Trustees and staff are educated on identifying and reporting illicit discharges during the County's MCM 6 training.

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Best Management Practice, Measurable Goals, Milestones, and Evaluation Methods (Part III.B.2.b.vi)

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 2-1a: Public Reporting		
Respond to citizen complaints and inquiries	On-Going	<ul style="list-style-type: none"> • Complaints, issues, and responses are tracked and documented • Data is compiled and evaluated during preparation of the annual report using established protocols
Respond to Construction Site Issues/Other Reporting Mechanisms	On-Going	
Respond to Stream and Watershed Issues/Other Reporting Mechanisms	On-Going	
Respond to Program Inquiries/Other Reporting Mechanisms	On-Going	

Rationale and Decision Process (Part III.B.2.b)

The target audiences, mechanisms, and strategies have been developed over several permit terms based on the following considerations:

- Establishing and maintaining a primary means for reporting issues, observations, and requesting services increases County efficiency and enhances service delivery.
- The County has established mechanisms and procedures in place to respond to reported issues.
- These mechanisms have proved successful in the past based on the number of complaints and inquiries received and responded to.
- Awareness and use of County reporting mechanisms have proven to be effective in identifying potential and confirmed water quality issues, including illicit discharges.
- Timely, informed response to citizen service requests builds confidence in the County.

Rationale for Program

No program modifications are planned.

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Program Area 2-2: Public Involvement Activities

Purpose

Involve residents in activities which protect water quality or raise awareness of stormwater issues.

Responsible Party/Implementation Partner(s) (Part III.B.2.b.v)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
2-2a	Pollution control activities	<ul style="list-style-type: none"> Plan, promote, and implement activities 	County	Partner agencies
2-2b	Stream and watershed awareness activities	<ul style="list-style-type: none"> Plan, promote, and implement activities 	County	Partner agencies

Legal Authority Limitations: None

Program Elements

The following program elements are established in order to meet small MS4 permit requirements and performance standards.

Best Management Practices

The small MS4 permit requires the SWMP to describe the types of public involvement activities included in your program. The following BMPs and associated strategies and mechanisms are established for this program area with the goal of providing at least one event under either category each year during the permit term. Events are promoted online, via social media, in partner agency e-newsletters, and through third-parties. The specific event(s) implemented during the permit term will be based on a yearly assessment of which events have success in attracting meaningful numbers of target audiences. Events may be planned, promoted, or conducted in conjunction with other entities should an appropriate opportunity arise.

BMP 2-2a: Pollution Control Activities

The County will plan, promote, and/or conduct at least one public involvement event targeting land-based pollution control activities. Public involvement activities in this activity can include, but not limited to:

- Tree and plant sales

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- Rain Barrels or Rain Gardens– Promote rain barrel theme at county fair or public event.
- Recycling events

BMP 2-2b: Stream and Watershed Awareness Activities

The County will provide information on at least one public involvement event targeting stream and watershed activities. Public involvement activities in this category include, but not limited to:

- Streambank stabilization / live-staking
- Clean Your Streams annual event

Target Audiences (Part III.B.2.b. iii)

- Residents: Familiar with the areas where they live, work, and play and are likely to generate a significant portion of reports of stormwater- related issues.
- Businesses and their Customers: Often use pollutants in high quantities and should be actively involved in reporting improper handling and disposal activities that can create significant pollutant sources.
- Property Owners: Located along water bodies within MS4 outfalls are uniquely situated to notice and report potential illicit discharges or activities that may impact water quality.

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Best Management Practices, Measurable Goals, Milestones, and Evaluation Methods (Part III.B.2.b.vi)

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 2-2a: Pollution Control Activities		
Plan, promote, and/or conduct public involvement event targeting land-based pollution control activities	Annually	<ul style="list-style-type: none"> • Event metrics are tracked and documented • Participation metrics including audience type, number of participants, and event location will be evaluated at the end of each year to assess program success and reach towards meeting County goals
BMP 2-2b: Stream and Watershed Awareness Activities		
Plan, promote, and/or conduct public involvement event targeting stream and watershed activity awareness	Annually	<ul style="list-style-type: none"> • Event metrics are tracked and documented • Participation metrics including audience type, number of participants, and event location will be evaluated at the end of each year to assess program success and reach towards meeting County goals

Rationale and Decision Process (Part III.B.2.b)

The target audiences, mechanisms, and strategies have been developed over several permit terms based on the following considerations:

- Public engagement is an efficient way to implement County programs and achieve County goals.
- Frequent, varied public involvement opportunities appeal to a broad range of interests and needs among County communities.
- Public involvement increases the likelihood of having a positive impact on local waterways.

Rationale for Program Modification

The following program elements are established in order to meet small MS4 permit requirements and performance standards.

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Program Area 2-3: Task Force Committee & Storm Water Management Plan (SWMP) Development

Purpose

Provide mechanisms for public involvement in the development and implementation of the SWMP.

Responsible Party/Implementation Partner(s) (Part III.B.2.b.v)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
2-3a	SWMP development with public input	<ul style="list-style-type: none"> • Meetings with partner agencies • Township representation • Public notice of County meetings • Posting and public notice for Draft SWMP • Response to comments in Draft Final SWMP • Public notice for Lawrence County Board of County Commissioner meeting 	County & Lawrence SWCD	Partner Agencies,

Legal Authority Limitations: None

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

Best Management Practices

The following BMPs and associated strategies and mechanisms are established for this program are:

BMP 2-3a: Storm Water Management Plan with Public Input

The small MS4 permit suggests that you involve the public in the development and submittal of your NOI and SWMP description. Opportunities for public input in the SWMP development process include:

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- Individual meetings with County Partner Agencies
- Individual meetings with Co-Permittees during SWMP development
- Public notice of draft SWMP availability for public review and comment
- Response to comments in preparing the final SWMP
- Public notice of a vote for approval of the County SWMP as an agenda item of the Board of Lawrence County Commissioners meeting on **Tuesday, March 29, 2022**

Target Audiences (Part III.B.2.b. iii)

- Residents: Represent a significant portion of County property owners within the County and have an inherent interest in implementation of County programs and activities.
- Businesses: Represent another significant portion of County property owners who, due to the nature of their activities, have an inherent interest in implementation of County programs and activities.
- Development Community: Impacted by County regulations related to construction site runoff control and post-construction stormwater management. They are also responsible for compliance with Ohio EPA's CGP, which is the foundation of the related County Erosion and Sediment Control Rules.
- Co-Permittee Jurisdictions: Key to implementation of the County SWMP plan and compliance with County regulations and policies and encompass a broad spectrum of interests, ethnicities, and economic groups.

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Best Management Practice, Measurable Goals, Milestones, and Evaluation Methods (Part III.B.2.b.vi)

The permit requires the small MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.”

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 2-3a: SWMP Development with Pubic Input		
Provide opportunities for public input into the County SWMP	April 1, 2022	<ul style="list-style-type: none"> • Compile comments received and responses provided • Summarize public input process and results when completed

Rationale and Decision Process (Part III.B.2.b)

The target audiences,, mechanisms, and strategies have been developed over several permit terms based on the following considerations:

- The County covers a small geographic area and 4 Co-Permittee jurisdictions.
- Effective implementation of SWMP activities require broad input into County program development.
- Partner agencies are the primary program implementation mechanism for most County programs.
- Co-Permittees are responsible for implementation of many County program activities and ensuring permit compliance. Their staff have been briefed on the impacts of new permit requirements covered by the SWMP as they apply to their community.
- The regional stormwater coalition has representation from Co-Permittee municipalities and townships.
- Lawrence County Board of County Commissioners meetings are public notice and open to the public.
- Offering the opportunity for public input via a public comment and review period is an appropriate and efficient practice for receiving input for a County program planning document.

Rationale for Program Modifications

The SWMP development effort has been added as a separate program area and BMP as its goal and target audiences differ from the programmatic public involvement activities.

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Program Area 2-4: Public Access to District Information

Purpose

Maintain the County website as the central location for providing the public access to County regulatory compliance documents including the Storm Water Management Plan (SWMP), County regulations, annual reports, public notices, and other County policy, plans, or regulatory documents.

Responsible Party/Implementation Partner(s) (Part III.B.2.b.v)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
2-4a	Develop web features	<ul style="list-style-type: none"> • Maintain and update website • Post County documents on website 	County	Partner agencies

Legal Authority Limitations: None

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

Best Management Practices (Part III.B.2.a)

The following BMPs and associated strategies and mechanisms are established for this program area are:

BMP 2-4a: Develop Web Features

The County maintains a website to provide the public with access to County regulations, public notices, and permit compliance documents and information.

- The County maintains a website and posts documents and links related to County permit compliance, regulations, policy, guidance, public notices, and reporting.
- Links to the County website are posted on partner agency websites to spread awareness.

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Target Audiences (Part III.B.2.b. iii)

The permit requires the County to identify who are the target audiences for your public involvement program.

- Residents: Represent a significant portion of County property owners within the County and have an inherent interest in implementation of County programs and activities.
- Businesses: Represent another significant portion of County property owners who, due to the nature of their activities, have an inherent interest in implementation of County programs and activities.
- Development Community: Impacted by County regulations related to construction site runoff control and post-construction stormwater management. They are also responsible for compliance with Ohio EPA’s CGP, which is the foundation of the related County Erosion and Sediment Control Rules.

Best Management Practices, Measurable Goals, Milestones, and Evaluation Methods (Part III.B.2.b.vi)

The permit requires the small MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs. The County will continue to pursue the measurable goals listed in the table below on an ongoing basis and evaluate compliance with these goals each year by tracking usage of each outreach mechanism and its content.

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 2-4a: Develop Web Features		
Update and maintain website	On-Going	<ul style="list-style-type: none"> • Tracking website updates • Data is compiled and evaluated annually during preparation of the annual report using established protocols
Update website with content	On-Going	<ul style="list-style-type: none"> • Periodic review to assess whether County information is up to date and is meeting program goals • Track added/revised content and compile summary information to be included in the annual report using established protocols

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Rationale and Decision Process (Part III.B.1.b)

The target audiences, mechanisms, and strategies have been developed over several permit terms based on the following considerations:

- Residents, businesses, and their customers within Lawrence County are not generally knowledgeable about stormwater and their impacts on local waterways.
- Public awareness of County regulations, policies, and program can result in positive impacts on local waterways.
- The public will become more engaged as their awareness of stormwater and related County regulations increase, reducing long-term compliance costs.
- Internet-based outreach is a cost-effective mechanism for reaching a large, diverse audience.
- Developers and property owners can alter streams and encroach into riparian areas, exacerbating flooding and erosion and degrading streamwater quality. The County website provides access to regulations and policies that can help mitigate these issues.
- A website containing key documents provides County stakeholders with an opportunity for meaningful engagement.

Rationale for BMP Modifications

This program area was added to the SWMP to recognize an existing County activity to provide public access to County permit compliance documents, regulations and policies, reporting, and public notices. This activity will continue during the permit term.

MCM 2 – Annual Reporting Requirements (Part III.B.2.c.iii)

MCM 3 - Annual Reporting Requirements (Part III.B.2.c.iii)
1. Identify each public involvement/participation activity conducted, including a brief description of the activity, the target pollutant(s) and include an estimate of how many people from your jurisdiction participate

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Minimum Control Measure 3 – Illicit Discharge, Detection, and Elimination (IDDE)

Introduction

You shall develop, implement, and enforce a program to detect and eliminate illicit discharges, as defined in Part VI of this permit, into your small MS4. For illicit discharges to your small MS4 via an adjacent, outside of your jurisdiction, interconnected MS4, you are only required to immediately inform the neighboring MS4 and inform Ohio EPA in your annual report. (Part III.B.3.a)

Performance standards include Initial dry-weather screening of all your storm water outfalls. Program shall establish priorities and specific goals for long-term system-wide surveillance of your small MS4, as well as for specific investigations of outfalls and their tributary area where previous surveillance demonstrates a high likelihood of illicit discharges data collected each year shall be evaluated and priorities and goals shall be revised annually. Comprehensive storm sewer system map shall be updated annually. Notify Ohio EPA (within 24 hours) of illicit sanitary cross connections from industrial, commercial, or multi-family sources and leaking or broken sanitary sewer lines that are actively contributing sewage to your small MS4.

Annual reporting requirements include a total number of MS4 outfalls. Number of outfalls which had dry-weather screening and a number of outfalls where dry-weather flows were identified. Number of outfalls where illicit discharges were identified via dry-weather screening or other methods and a number of outfalls where illicit discharges were eliminated, and a number of illicit discharges identified through other methods and the number eliminated. A list of all illicit discharges that have been identified but have yet to be eliminated and a summary of any storm sewer system mapping updates if applicable.

The following three program areas establish the framework of public education and outreach within this current SWMP:

Program Area 3-0: Ordinance

Program Area 3-1: Storm Sewer System Mapping

- Create a GIS-based map of County stormwater infrastructure that supports planning, maintenance, and permit compliance needs, as well as provide ongoing MS4 surveillance during mapping activities.

Program Area 3-2: Home Sewer Treatment System (HSTS) Management

- Locate HSTSs and their discharge points, monitor and manage them consistent with applicable state laws and local regulations.

Program Area 3-3: Illicit Discharge Detection and Elimination

- Eliminate illicit discharges to the MS4 through a cost-effective blend of system surveillance methods and enforcement of applicable legal authorities.

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Program Area 3-1: Storm Sewer System Map

Purpose

Create a GIS or paper map of all County’s Storm Water HSTSs that supports planning, maintenance, and permit compliance needs as well as provide an additional mechanism for ongoing MS4 surveillance for illicit discharges.

Responsible Party/Implementation Partner(s) (Part III.B.3.i.vi)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
3.0	Ordinance or other regulatory mechanism	<ul style="list-style-type: none"> Regulatory mechanism requiring implementation of proper erosion and sediment control measures. 	County	
3-1a	MS4 Mapping Program Planning	<ul style="list-style-type: none"> Develop mapping protocol Refine mapping protocols Develop a mapping delivery system for MS4 	County	Lawrence County Health Department (LCHD)
3-1b	Map Existing MS4	<ul style="list-style-type: none"> Create map of MS4 outfall location screening sites and receiving waters Map MS4 using field and office-based protocols Maintain map of impervious cover Update map to label type of post-construction controls 	County	LCHD
3-1c	Map New MS4	<ul style="list-style-type: none"> Map new MS4 areas using construction documents and as-built plans 	County	LCHD

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

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Best Management Practices

The permit requires a comprehensive storm sewer system map, showing the location of all outfalls and the names and locations of all surface waters of the state that receive discharges from those outfall, catch basins, pipes, ditches, flood control facilities (retention/detention ponds), and post-construction water quality BMPs (public and private) previously existing post-construction BMPs shall be identified by type of practice within five (5) years of the effective date of this permit. The following BMPs and associated strategies and mechanisms are established for this program area:

BMP 3-0: Ordinance or other Regulatory Mechanisms

BMP 3-1a: MS4 Mapping Program Planning

- The County will develop an initial storm sewer system map under previous permit terms. If funds are available.
- A paper map will reflect the HSTSs

BMP 3-1b: Map Existing MS4

- Mapping of field-observed outfalls, other field screening locations, and associated surface waters of the state was completed previously. Locations and/or status are updated based on observations made during field screening, MS4 mapping, or other County field activities.
- Mapping of the MS4 system infrastructure identified in the permit was completed during the previous permit term.
- A MS4 map will ensure that the mapping is kept up to date as new inspections are conducted.
- GIS-based MS4 map will refined as new technologies and software emerge (latest is ArcGIS-PRO). If funds are available.
- Mapping of existing infrastructure is performed for Co-Permittees as they share construction documents and plans.
- As-builts of constructed stormwater infrastructure, from current permitted projects.
- Previously existing post-construction controls will be labeled based on type of practice by April 1, 2026.

BMP 3-1c: Map New MS4

- County will continuously update the MS4 map following established protocols. New MS4 infrastructure is mapped using construction documents. New post-construction controls will be mapped after final inspection and will be labeled based on type of practice.

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Measurable Goals, Milestones, and Evaluation Methods (Part III.B.3.c.vii)

The permit requires the small MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs”

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 3-1a: MS4 Mapping Program Planning		
Develop mapping protocol	Completed in previous permits	<ul style="list-style-type: none"> • Document lessons learned • Review mapping approach during annual program reviews
Refine mapping protocol	On-Going	
BMP 3-1b: Map Existing MS4		
Initial MS4 Mapping	Complete in previous permits	<ul style="list-style-type: none"> • N/A
Use field-based mapping to refine MS4 map	On-Going	<ul style="list-style-type: none"> • Periodic review of current map delivery system • Feedback from users
Platform office-based QA/QC of MS4 map	On-Going	<ul style="list-style-type: none"> • Review progress annually • Evaluate data, processes, and lessons learned
Map previously constructed post-construction BMPs	April 1, 2026	<ul style="list-style-type: none"> • Define locations, BMP type through records review, BMP inspections, and/or other field activities • Review progress annually
Maintain impervious cover map	On-Going	<ul style="list-style-type: none"> • Review updates at least once a year to verify inclusion of new imagery
BMP 3-1c: Map New MS4		
Map new MS4s/post-construction BMPs from construction documents	On-Going	<ul style="list-style-type: none"> • Compile information on new storm sewers and post-construction controls • Annual review to evaluate progress

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Rationale and Decision Process (Part III.B.3.i)

The target audiences, mechanisms, and strategies have been developed over several permit terms based on the following considerations:

- Comprehensive map of the storm sewer system within Lawrence County is essential to meet Ohio EPA and local compliance objectives.
- Use of a standardized mapping protocol provides consistency.
- Maintaining a centralized GIS-based MS4 map provides control over content and ease of use.
- Two-phase mapping process, incorporating both field and office operations is the most cost-effective way to develop and maintain the MS4 map.
- Field mapping activities provide another mechanism for identifying potential illicit discharges and is part of the long-term outfall surveillance program.

Rationale for Program Modification

- Labeling post-construction control types is a new requirement under the latest small MS4 permit.
- Mapping protocol will adapt to field and office operations of the MS4 map.
- New requirement of labeling post-construction control types.

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Program Area 3-2: Home Sewage Treatment System (HSTS) Management

Purpose

Locate HSTSs and their discharge points and manage them accordingly with applicable state laws and local regulations.

Responsible Party/Implementation Partner(s) (Part III.B.3.i.vi)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
3.0	Ordinance or Other Regulatory Mechanisms	<ul style="list-style-type: none"> Regulatory mechanism requiring reporting of proper erosion and sediment control measures. 	County	
3-2a	Map HSTSs	<ul style="list-style-type: none"> Maintain County HSTS inventory list Map HSTSs and the associated MS4 connections 	LCHD	Co-Permittees
3-2b	Update HSTS Control Plan	<ul style="list-style-type: none"> Update and maintain the HSTS plan 	LCHD	
3-2c	Screen HSTS	<ul style="list-style-type: none"> Inspect HSTSs for proper operation 	LCHD	
3-2d	Enforce HSTS Plan	<ul style="list-style-type: none"> Require and enforce order to either connect to the sanitary sewer or repair/replace malfunctioning systems 	LCHD	

Legal Authority Limitations: As the responsible party for this program area, Lawrence County Health Department is subject to Ohio RevisedCode 3718 and Ohio Administrative Code 3701-29.

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

Best Management Practices

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BMP 3-0: Ordinance or Other Regulatory Mechanism

The county has A regulatory mechanism requiring implementation of proper erosion and sediment control will be implemented.

BMP 3-2a: Map HSTS

The permit requires a list of all on-site sewage disposal systems located within your jurisdiction and are connected or discharging to your small MS4. A storm sewer map showing the locations of all HSTSs connected or discharging to your small MS4 the type and size of conduits/ditches in your small MS4 that receive discharges from HSTSs, as well as the water bodies receiving the discharges from your small MS4. HSTS lists and maps were prepared by the County during the previous permit terms, and are maintained in the following manner:

- The County maintains an inventory of HSTSs within County boundaries.
- The County maintains and updates a paper map of HSTSs and their discharge points within the County boundaries. This map includes attributes of the MS4 and the bodies of water receiving discharges from the MS4.

BMP 3-2b: Update HSTS Control Plan

The permit requires the County to Establish priorities and specific goals for long-term systemwide surveillance. Working with the Lawrence County Health Department, the County will create layers within the GIS map to include the locations of known HSTSs within the County boundaries (when funds are available). Through field inspections conducted by LCHD personnel, the inspectors are able to inspect and edit the HSTS layer directly in the GIS program, creating a long-term surveillance program that will focus on previously identified “hot-spots”, as well as issues and complaints received at the County or LCHD.

- The county implements this surveillance program through partnership.

BMP 3-2c: Screen HSTSs

The permit includes three requirements for coordinating regulations of on-site sewerage disposal systems:

- Proactively identify residences with existing individual discharging HSTSs that can be legally, feasibly, and economically connected to central sewers.
- Implement/enhance an existing operation and maintenance program which determines if existing discharging

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- HSTSS are operating as designed and ... requires elimination, upgrade, or replacement.
- Evaluate the planned or possible future installation of sewers for areas which contain high densities of discharging HSTSS.

LCHD routinely inspects HSTSS within the County boundaries to determine whether these systems are operating as designed.

BMP 2-3d: Enforce HSTS Plan

The permit states that if a contamination source has been identified as a discharging HSTS that is not operating as designed the permit requires the County to resolve the non-functioning HSTS with connection to central sewers, replacement with system that does not discharge or allowing a replacement discharging HSTS when no other option is available. When a malfunctioning system is identified, the plan requires one of the following actions, in compliance with the Ohio and/or Lawrence County Health Codes:

- Enforce order to repair malfunctioning HSTSS
- Enforce order to replace malfunctioning HSTSS
- Enforce order to connect to a centralized sanitary sewer system

Governed by the Ohio Revised Code and the Ohio Administrative Code, the Lawrence County Health Department enforces the order to repair, replace, or connect malfunctioning HSTSS to a centralized system through its operation and maintenance (O&M) management for sewage treatment systems.

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Measurable Goals, Milestones, and Evaluation Methods (Part III.B.3.c.vii)

The permit requires the MS4 operator to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 3-2a: Map HSTS		
Maintain HSTS list Map HSTSs and their MS4 connections	On-Going	<ul style="list-style-type: none"> Review annually to assess progress as part of established workplan/budget and annual report development protocols
BMP 3-2b: Update HSTS Control Plan		
Update and maintain HSTS plan	On-Going	<ul style="list-style-type: none"> Review annually to assess progress as part of established workplan/budget and annual report development protocols
BMP 3-2c: Screen HSTS		
Inspect HSTSs for proper operation	On-Going	<ul style="list-style-type: none"> Review annually to assess progress as part of established workplan/budget and annual report development protocols
BMP 3-2d: Enforce HSTS Plan		
Require and enforce orders to connect to centralized sanitary sewer or repair/replace	On-Going	<ul style="list-style-type: none"> Review annually to assess progress as part of established workplan/budget and annual report development protocols

Rationale and Decision Process (Part III.B.3.i)

The target audiences, mechanisms, and strategies have been developed over several permit terms based on the following considerations:

Most of the HSTSs owners within Lawrence County, are not on public sewer systems. When properly operated, monitored, and maintained in accordance with LCHD regulations, HSTSs can be managed to minimize pollution to the receiving waters so they are not a significant pollution source. Because there is always some risk with discharging systems causing pollution, upgrades/updates or replacements are required when changing flow/waste strength to such systems or when substantial changes occur to the home. Existing HSTS inspection programs are a cost-effective way of detecting and eliminating illicit discharges in drainage catchments where HSTSs predominate. Funds from state and federal programs also help to offset the cost of replacing or connecting to a centralized sanitary sewer should the resident fall within a determined poverty level.

Rationale for Program Modification

Enforcing an HSTS plan was the combination of previous measurable goals from the last permit.

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Program Area 3-3: Illicit Discharge Detection and Elimination (IDDE)

Purpose

Eliminate illicit discharges to the MS4 through a cost-effective blend of system surveillance methods and aggressive enforcement of applicable legal authorities.

Responsible Party/Implementation Partner(s) (Part III.B.3.i.vi)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
3-3a	Prioritize Surveillance and Investigations Using Available Information	<ul style="list-style-type: none"> Targeted prioritization approach 	LCHD, County	
3-3b	Dry-weather Screening	<ul style="list-style-type: none"> Conduct dry-weather outfall screening at priority locations using established protocols 	LCHD	Co-Permittees
3-3c	Proactive Source Screening	<ul style="list-style-type: none"> Perform surveillance during business inspections Perform surveillance during MS4 mapping 	LCHD	
3-3d	Reactive Source Screening	<ul style="list-style-type: none"> Train MS4 staff on IDDE identification and reporting Respond to reports/referrals from other agencies and Co-Permittees Respond to public reporting through County website and phone calls received 	LCHD	County, Co-Permittees, Other local agencies
3-3e	Investigations and Enforcement	<ul style="list-style-type: none"> Investigate reports/evidence of illicit discharges Issue and enforce elimination orders Respond to spills 	LCHD	County, Co-Permittees, Other local agencies

Legal Authority Limitations: The County’s Partner Agency, Lawrence County Health Department, can investigate good faith complaints.

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Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

Best Management Practices

The permit requires the County to develop and implement a program to detect and eliminate non-storm water discharges, including illegal dumping, to your system. To comply with MS4 permit requirements, the County has developed an IDDE plan with the local health department, LCHD. The plan has been developed over the years and through the phases of the previous permit requirements. Latest modifications of the plan include:

- Protocols for prioritizing dry-weather screening at outfall locations
- Description of the long-term surveillance program
- Collection and analysis of field samples where illicit discharges are suspected
- Identifying and investigating confirmed illicit discharges contributing area and source(s)
- Process for illicit discharge elimination, as defined by LCHD regulations

The IDDE plan was reviewed by the County and LCHD, and revisions are currently being made to address historical lessons learned and incorporating new protocols to sufficiently meet all permit requirements. The following BMPs and associated strategies and mechanisms are established for this program area:

BMP 3-3a: Prioritize Surveillance and Investigations Using Available Information

Your program shall establish priorities and specific goals for long-term system-wide surveillance of your small MS4, as well as for specific investigations of outfalls and their tributary area where previous surveillance demonstrates a high likelihood of illicit discharges. The County completed screenings of all outfall locations within its boundaries under the prior permit terms. Other activities employed by the County assisted in identifying illicit discharges, to include:

- Training MS4 staff to identify and report suspected illicit discharges
- Perform surveillance during MS4 mapping
- Perform surveillance during construction and post-construction stormwater control inspections
- Referrals by partner agencies and other public entities
- Response to public reporting and complaints
- Response to reported spills

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BMP 3-3b: Dry-weather Screening

The permit requires the County “shall have already included an initial dry-weather screening of all your storm water outfalls.” The permit also requires the County to “implement a program to detect and eliminate non-storm water discharges, including illegal dumping, to your system.” From the screenings of the previous permit term, outfalls determined to be high-priority areas, or “hot-spots,” will be the focus of field surveillance of future screenings. The outfall location field screening program will:

- Be conducted using established procedures set forth by LCHD in the IDDE plan.
- Include pollutant sampling of suspected illicit discharge locations.
- Include follow-up investigations to identify the source(s).
- Report identified cross-connections or broken sanitary lines discharging to the small MS4 to Ohio EPA within 24 hours.

BMP 3-3c: Proactive Source Screening

The County will continue to implement the existing activities under its proactive source screening program for medium and low priority catchments. These include, but are not limited to, surveillance for potential illicit discharges during:

- Targeted business screenings by LCHD
- MS4 mapping activities by the County, LCHD, and Co-Permittees
- Random inspections from MS4 staff while conducting other regular duties in the field
- Suspected illicit discharges will be reported to LCHD for follow-up investigation and enforcement activities.

BMP 3-3d: Reactive Source Screening

The County will continue to implement the existing activities under its reactive source screening program for medium and low priority catchments. These activities include, but are not limited to:

- Training of MS4 staff (under the MCM 6 annual training program) to identify and report suspected illicit discharges
- Responding to reports of suspected illicit discharges from partner agencies and other government entities
- Responding to reports of suspected illicit discharges discovered during MS4 mapping
- Illicit discharge education and outreach (MCM 1) and subsequent response to citizen inquiries and complaints reported through the County Health Department and Partner Agencies.

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- Suspected illicit discharges discovered through this surveillance will be reported to LCHD for follow-up investigation and enforcement activity.

BMP 3-3e: Investigation and Enforcement

The permit requires the County to “effectively prohibit, through ordinance or other regulatory mechanism, illicit discharges into your storm sewer system and implement appropriate enforcement procedures and actions,” (Part III.B.3.d). Legal authority for IDDE enforcement falls upon LCHD through the ORC and OAC sections applicable. Where suspected illicit discharges are identified, the County and LCHD will:

- Collect and analyze samples at the discharge location to determine the presence of pollutant(s)
- Investigate and identify the source(s) in the contributing area
- Develop in coordination with the responsible party a plan to eliminate the source(s)
- Implement enforcement actions for non-compliant owners following established protocols
- Turn over enforcement to applicable municipal entity
- Revisit the site periodically to verify the illicit discharges have ceased

LCHD will identify all illicit discharges detected, those eliminated, and those that have not been eliminated. The following information will be reported to Ohio EPA: location, estimated volume, source and type, the receiving water body, and a schedule for elimination.

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Measurable Goals, Milestones, and Evaluation Methods (Part III.B.3.c.vii)

The permit requires the small MS4 operator to “evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs,”

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 3-3a: Prioritize Surveillance and Investigations Using Available Information		
Develop prioritization approach for surveillance and investigations using available information	On-Going	<ul style="list-style-type: none"> • Conduct pilot testing to evaluate priority factors
Conduct pilot testing of prioritization approach	On-Going	<ul style="list-style-type: none"> • Review results of pilot testing program • Develop correlation between predicted and actual results • Revise priority factors as necessary based on results
Prepare prioritization for on-going surveillance	On-Going, annual review	<ul style="list-style-type: none"> • Annual review and update as needed
BMP 3-3b: Dry-weather Field Screening		
Conduct system-wide outfall screening	Completed in prior permit term	<ul style="list-style-type: none"> • N/A
Conduct targeted outfall screening at priority sites	On-Going	<ul style="list-style-type: none"> • Compile tracking results • Review annually to assess progress as part of established workplan/budget/annual report development protocols
BMP 3-3c: Proactive Source Screening		
Conduct surveillance at businesses	On-Going	<ul style="list-style-type: none"> • Compile tracking results
Conduct surveillance during MS4 mapping	On-Going	<ul style="list-style-type: none"> • Review annually to assess progress as part of established workplan/budget/annual report development protocols
Conduct as-needed inspections/surveys	On-Going	<ul style="list-style-type: none"> • Compile tracking results
BMP 3-3d: Reactive Source Screening		
Respond to citizen inquiries	On-Going	<ul style="list-style-type: none"> • Compile tracking results
Respond to reports from other government entities	On-Going	<ul style="list-style-type: none"> • Review annually to assess progress as part of established workplan/budget/annual report development protocols

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BMP 3-3e: Investigations and Enforcement		
Define legal authority	Completed in previous permit	<ul style="list-style-type: none"> • N/A
Investigate report/evidence of illicit discharges	On-Going	<ul style="list-style-type: none"> • Compile tracking results • Review annually to assess progress as part of established workplan/budget/annual report development protocols
Issue and enforce illicit discharge elimination orders as allowed under local and state codes		
Respond to all major spills, document response		

Rationale and Decision Process (Part III.B.3.i)

- Prior MS4 permit-mandated dry-weather screenings did not reveal evidence of a side-scale incidence of illicit discharges.
- Effective and efficient methods to identify incidents of illegal discharges include annual MS4 training for employees, MS4 mapping, targeted business inspections, referrals from other government agencies, and complaints/reports submitted by the public to the County office, LCHD, or Ohio EPA.
- A prioritized and targeted approach on “hot-spots” and other key catchments enables the County and LCHD to yield evidence of illicit discharges.
- LCHD investigation process is a cost-effective solution at identifying sources of illicit discharges and developing plans to eliminate them.
- State and County regulations, enforcement protocols, and mechanisms are in place to eliminate illicit discharges.
- The County utilizes a GIS database to track and report incidents at outfalls.

Rationale for Program Modifications

With the previous permit requiring the inspection of all outfalls in a dry-weather status, the change to a surveillance of high priority catchments along with responses to reports from other government entities and the public allow for a continuous inspection approach to ensure that illicit discharges are detected and resolved promptly.

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MCM 3 – Annual Reporting Requirements (Part III.B.3.j.vii)

MCM 3 - Annual Reporting Requirements (Part III.B.3.j.vii)
1. Document the total number of outfalls
2. Document the Number of outfalls which had dry-weather screening
3. Document the Number of outfalls where dry-weather flows were identified
4. Document the Number of outfalls where illicit discharges were identified via dry-weather screening or other methods
5. Document the Number of outfalls where illicit discharges were eliminated
6. Document the Number of illicit discharges identified through other methods and the number eliminated
7. Provide a list of all illicit discharges that have been identified but have yet to be eliminated, including details on the location, an estimate of volume (gpd), the source and the type (continuous/intermittent/one-time), the types of pollutants believed to be present, the receiving surface water and an estimated schedule for elimination
8. Provide a summary of any storm sewer system mapping updates
9. If applicable, provide a summary of activities taken to satisfy your illicit discharge detection and elimination program.

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Minimum Control Measure 4 – Construction Site Runoff Control

Introduction

You shall develop, implement, and enforce a program to reduce pollutants in any storm runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of pollutants in storm water discharges from construction activity disturbing less than one acre shall be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.

Performance standards of this measure include the need to enact an ordinance or other regulatory mechanism with the technical requirements set forth in the Ohio EPA NPDES General Storm Water Permit for Construction Activities (OHC000005). Within one (1) year of the effective date of this permit. The County must perform pre-construction (SWP3) review and approval and use an “objective tool such as software or checklist to document each SWP3 review, as well as to document each site inspection. Documentation must be maintained of any communications regarding review and plan revisions and any notification to obtain NPDES permit coverage.

Annual reporting requirements included in this measure:

- Number and list of applicable sites in your jurisdiction for the reporting year
- Number of pre-constructions SWP3’s reviewed and number approved
- Number and average frequency of site inspections
- Number of violation letters/reports/notices issued
- Number of enforcement actions taken
- Number of complaints (external and internal) received, and number addressed.

The following program area was established in the original SWMP, and will continue throughout the current permit term:

Program Area 4-0: Ordinances or Other Regulatory Mechanisms

The County has regulatory mechanisms requiring implementation of proper erosions and sediment control measures.

Program Area 4-1: Construction Site Runoff Control

Purpose

- Require control of erosion, sedimentation, and other pollution during construction projects.

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Responsible Party/Implementation Partner(s) (Part III.B.4.b.vii)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
4.0	Ordinance or other regulatory mechanism	<ul style="list-style-type: none"> Regulatory mechanisms requiring implementation of proper erosion and sediment control measures. 	County	
4-1a	Site -Plan Approvals	<ul style="list-style-type: none"> Review plans for applicability Review and approve applicable plans using a standardized plan review checklist 	County	
4-1b	Site Inspections	<ul style="list-style-type: none"> Conduct pre-construction meetings Inspect sites with earth disturbing activities using a standardized inspection checklist Receipt and response to information submitted by the Public 	County	
4-1c	Enforcement	<ul style="list-style-type: none"> County regulations consistent with Ohio EPA Construction General Permit (CGP) Issue Notice of Violations (NOV), Stop Work Orders, and legal action if necessary Written enforcement escalation policy 	County	County Prosecutor, Co-Permittees

Legal Authority Limitations: Ohio Revised Code Section 307.79 – Administrative Rules

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

Best Management Practices

The following BMPs, associated strategies, and mechanisms are established for this program area:

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BMP 4-1a: Plan Approvals

The permit requires the small MS4 operator to develop procedures for storm water pollution prevention plan review which incorporate consideration of potential water quality impacts. Also required is an objective tool such as software or checklist shall be used to document each SWP3 review. The County employs a standardized approach for reviewing and approving plans, which includes:

- Initial review for plan applicability of all Federal, State, and local rules and regulations
- Formal plan review and approval using a standardized approach
- Use of standardized SWP3 plan review checklists covering all requirements:

BMP 4-1b: Site Inspections

The permit requires the small MS4 operator to develop procedures for receipt and consideration of information submitted by the public, and procedures for site inspection and enforcement of control measures. Other requirements include “procedures for site inspection and enforcement of control measures” using an objective tool such as software or checklist. The County utilizes a web-based program that was formulated and adapted by MS4 staff based off of Ohio EPA site checklists. The site inspection process includes the following mechanisms:

- Facilitating a pre-construction meeting for each site to review the site plans as they relate to sediment and erosion control practices and waste management practices
- Inspections of all permitted earth disturbance sites at least once a month
- Use of a standardized inspection checklist and entry of information in to the program, which directly communicates with Permittees and Co-Permittees of the CGP through e-mail.
- Immediate Stop Work Orders hand-delivered to site owners/operators should an applicable earth disturbance being conducted should not be permitted or a SWP3 reviewed by the County office. Inspections of these sites are conducted every 14 (fourteen) days until a County-approved SWP3 and CGP are obtained, with inspections then transitioning to once a month externally.

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BMP 4-1c: Enforcement

The permit requires the County to enact an “ordinance or other regulatory mechanisms equivalent with the technical requirements set forth in the Ohio EPA NPDES General Storm Water Permit for Construction Activities (OHC000005) within one (1) year of the effectivedate of this permit.” Further requirements include “an ordinance or other regulatory mechanism to require erosion and sediment controls, and non-sediment pollutant controls, as well as sanctions to ensure compliance, to the extent allowable under State orlocal law,” with a program that will include “a written enforcement escalation policy describing your procedures for when you will use certain sanctions including nonmonetary penalties (such as stop work orders), fines, bonding requirements...” The County’s enforcement escalation process is standardized in Ohio Revised Code Section 307.79, and such rules outlined include:

- Utilizing a software to provide real-time inspection reports to Permittees, Co-Permittees, and other applicable representatives regarding maintenance and corrective items noted on site that require attention
- Issuance of Notice of Violations (NOV), Stop Work Orders (SWO), and/or legal actions if problems are severe or persist beyond a reasonable measure of time
- Increased frequency of inspections for sites with persistent issues

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Measurable Goals, Milestones, and Evaluation Methods (Part III.B.4.b.viii)

The permit requires the small MS4 operator to “evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs”

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 4-1a: Plan Approvals		
Review all plans for applicability	On-Going	<ul style="list-style-type: none"> • Collect tracking data annually • Data is compiled and evaluated annually with established protocols • Verify plans are reviewed in accordance with regulations
Review and approve applicable plans	On-Going	<ul style="list-style-type: none"> • Collect tracking data annually • Data is compiled and evaluated annually with established protocols
Develop and implement SWP3 review checklists; document plan reviews	On-Going	<ul style="list-style-type: none"> • Evaluate standardized checklist for compliance with CGP requirements • Evaluate documentation process annually • Future reviews to verify checklists have been completed as required and apply to most current rules and regulations
BMP 4-1b: Site Inspections		
Conduct pre-construction meetings	On-Going	<ul style="list-style-type: none"> • Consolidate meeting information once a year • Data is compiled and evaluated annually with established protocols
Inspect earth disturbed sites	On-Going	<ul style="list-style-type: none"> • Annual review to identify number of inspections completed at each active site through tracking software • Data is compiled and evaluated annually with established protocols • Evaluate whether minimum inspection rate is achieved
Develop and implement a standardized inspection checklist	On-Going	<ul style="list-style-type: none"> • Evaluate and update standardized checklist for compliance with CGP requirements • Periodic reviews to verify inspections have been completed as required

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BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 4-1c: Enforcement		
Refine protocols/guidance to be equivalent with applicable Ohio EPA CGP	Completed	<ul style="list-style-type: none"> • Review new CGP • Update Lawrence County Commissioners Erosion and Sediment Control Rules
Issue Notice of Violation, Stop Work Order, and legal action if necessary	On-Going	<ul style="list-style-type: none"> • Consolidate tracking data annually • Data is compiled and evaluated annually with established protocols
Develop written enforcement escalation policy	Completed	<ul style="list-style-type: none"> • Review plan to verify it meets MS4 permit requirements • Update/revise for all future releases of NPDES permits

Rationale and Decision Process (Part III.B.4.b)

The following rationale and decision processes were used to develop this program area:

- A strong, consistently applied program is imperative for a successful construction site stormwater control.
- Current mechanisms for public input and information have been successful in identifying potential and actual construction-related issues, and will continue into the future.
- The County will use standardized plan review and inspection checklists to ensure consistent application of County and state requirements. Retaining these completed checklists will provide documentation of the program consistency regardless of project type or size.
- Pre-construction meetings are an excellent opportunity to educate participants on the importance of compliance with sediment and erosion control practices and site waste management requirements in protecting local waterways.
- Existing site inspection program maintains water quality as a priority in active construction projects.
- The County resolves identified construction site issues through cooperation with site representatives and owners.
- When necessary, implementation of the enforcement escalation policy has proved successful and will continue.
- Tracking systems for construction plan reviews and approvals, site inspections, and enforcement are currently being utilized.

Rationale for Program Modifications

Requirements for standardized plan review and inspections are new in the MS4 permit and have been incorporated into this program..

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MCM 4 – Annual Reporting Requirements (Part IV.B.4.c.v)

MCM 4 - Annual Reporting Requirements (Part III.B.4.c.v)	
1.	Document the number and list of applicable sites in your jurisdiction for the reporting year
2.	Document the number of pre-constructions SWPPPs reviewed, and number approved
3.	Document the number and average frequency of site inspections
4.	Document the number of violation letters/reports/notices issued
5.	Document the number of enforcement actions taken
6.	Document the number of complaints (external and internal) received, and number addressed

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Minimum Control Measure 5 – Post-Construction Stormwater Management

Introduction

You shall develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one (1) acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your small MS4. Your program shall ensure that controls are in place that will prevent or minimize potential water quality impacts. You shall develop and implement strategies which include a combination of structural and/or non-structural post-construction runoff controls appropriate for your community.

Performance standards of this program include enacting “ordinance or other regulatory mechanism equivalent with the technical requirements set forth in the Ohio EPA NPDES General Storm Water Permit for Construction Activities (OHC000005). Within one (1) year of the effective date of this permit. The County will perform pre-construction (SWP3) review and approval to ensure that required post-construction controls are designed per requirements using an objective tool such as software or checklist.” Inspections will be conducted to ensure that controls are installed per requirements, and the County requires that long-term O&M plans are developed and agreements in place including after changes of ownership that private and public post-construction runoff controls are being maintained, with inspections of the controls occurring annually. the County provides an educational opportunity to contractors, SWP3 designers, and/or employees on permit OHC000004

Annual reporting requirements of this program include:

- Number of applicable sites in your jurisdiction requiring post-construction controls for the reporting year
- Number of pre-construction SWP3 reviews and approvals for post-construction runoff controls
- Number of inspections verifying that post-construction runoff controls were built per requirements
- Number of enforcement actions taken for failure to adequately install post-construction runoff controls and the number of enforcement actions taken for a failure to maintain
- Number of long-term O&M plans developed and agreements in place for post-construction runoff controls
- Number of long-term O&M inspections performed on post-construction controls
- If applicable, summary of activities taken to satisfy your post-construction storm water management program.

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Program Areas

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

Program Area 5-0: Ordinances

Program Area 5-1: Post-construction Stormwater Management

Require the installation of permanent stormwater controls, with consideration of green infrastructure, for complete construction projects and ensure controls are properly maintained via inspections and enforcement actions.

Program Area 5-2: Installation of Post-construction Stormwater Controls in Co-Permittee MS4s

Implement structural and/or non-structural post-construction stormwater controls, within Co-Permittee MS4s discharging to a watershed.

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Program Area 5-1: Post-construction Stormwater Management

Purpose

Require installation of structural and non-structural permanent stormwater controls. for completed construction projects in the County, and ensure controls are properly maintained via inspections and enforcement actions.

Responsible Party/Implementation Partner(s) (Part III.B.5.e.vii)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
5.0	Ordinance or other mechanism regulatory mechanisms	<ul style="list-style-type: none"> Regulatory mechanism requiring implementation of proper erosion and sediment control measures. 	County	
5-1a	Site Plan Approvals	<ul style="list-style-type: none"> Review plans for applicability Review and approve applicable plans using a standardized plan review checklist 	County	Partner Agencies
5-1b	Construction Site Inspections	<ul style="list-style-type: none"> Conduct pre-construction meetings Inspect all BMP installations for proper construction using a standardized inspection checklist 	County	Co-Permittees
5-1c	Long-Term O&M	<ul style="list-style-type: none"> Maintain long-term O&M plans and agreements Conduct and/or require inspections of existing BMPs for proper maintenance and operation 	County	Co-Permittees
5-1d	Enforcement	<ul style="list-style-type: none"> Enact County regulations consistent with Ohio EPA CGP Conduct enforcement actions when necessary Written enforcement escalation plan 	County	County Prosecutor

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Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

Best Management Practices

The following BMPs, associated strategies, and mechanisms are established for this program area:

BMP 5.0: Ordinance or Other Regulatory Mechanisms

The County has regulatory mechanisms requiring implementation of proper erosion and control measures.

BMP 5-1a: Site Plan Approvals

The County is required to perform a pre-construction SWP3 review and approval of all projects from construction activities that result in a land disturbance of greater than or equal to one (1) acre to ensure that required post-construction controls are designed per requirements software or checklist shall be used to document each SWP3 review. Documentation of any communications regarding review and plan revisions shall be maintained. The plan approval process includes the following mechanisms:

- Initial review for plan applicability based on state and local rules and regulations
- Formal plan review and approval using a standardized approach
- Use of standardized SWP3 plan review checklists covering all requirements established under the Ohio EPA CGP.
- Document communications between Developer and County.

BMP 5-1b: Construction Site Inspections

The permit requires applicable sites shall be inspected to ensure that controls are installed per requirements. An objective tool such as software or checklist shall be used to document each site inspection to ensure all conditions of OHC000005 are addressed. The County inspects the post-construction controls during active construction, with the sediment control (usually a specified skimmer) attached. Upon final stabilization of the site, the control is inspected to ensure the transition from sediment control to post-construction is achieved according to the approved SWP3. The long-term post-construction BMP is then inspected annually within the inspection software for tracking purposes and correspondence with Owners.

BMP 5-1c: Long-term Operation and Maintenance (O&M)

The County's program is required to ensure that long-term O&M plans are developed and agreements in place for all applicable sites, including after changes of ownership. Further requirements include the County maintain a copy of the long-term O&M

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plans and agreements provided during construction and document long-term O&M inspections. And require one on-site inspection of each post-construction runoff control during this permit term. The County accomplishes this by:

- Using the standard plan review checklist while conducting plan reviews and approvals, including verification of proper long-term O&M plans to be recorded for the site/plat.
- All new controls inspected annually to ensure that proper maintenance and operation is occurring for the control
- Documentation of identified issues, remedies, and related communications is maintained by the County regulations provide a path for remedying issues identified during O&M inspections

BMP 5-1d: Enforcement

The permit requires the County to enforce an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects. The County employs the required action of this measure through language in the long-term BMP agreement that maintains the control on a site in perpetuity. The Lawrence County Commissioners' Water Quality & Erosion and Sediment Control Plan. Rules includes the process for enforcement actions in regards to deficiencies found during post-construction control inspections. Co-Permittees of the County's small MS4 permit maintain their own standards of ordinances to enforce corrective actions against Owners.

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Measurable Goals, Milestones, and Evaluation Methods (Part III.B.5.e.viii)

The County is required to “evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 5-1a: Plan Approvals		
Review all plans for applicability	On-Going	<ul style="list-style-type: none"> • Collect tracking data annually • Data is compiled and evaluated annually with established protocols • Verify plans are reviewed in accordance with regulations
Review and approve applicable plans	On-Going	<ul style="list-style-type: none"> • Collect tracking data annually • Data is compiled and evaluated annually with established protocols
Develop and implement SWP3 review checklists; document plan reviews	On-Going	<ul style="list-style-type: none"> • Evaluate standardized checklist for compliance with CGP requirements • Perform periodic reviews of checklist based on developer feedback and update if necessary
BMP 5-1b: Construction Site Inspections		
Conduct pre-construction meetings	On-Going	<ul style="list-style-type: none"> • Tracking data is collected annually • Data is compiled and evaluated annually with established protocols
Inspect sites for proper post-construction BMP installation		
Develop and implement a standardized inspection checklist	Completed	<ul style="list-style-type: none"> • Perform future reviews of checklist based on developer feedback and update accordingly • Perform random periodic reviews of documentation practices
BMP 5-1c: Long-term Operation and Maintenance (O&M)		
Review and retain applicable O&M agreements	On-Going	<ul style="list-style-type: none"> • Tracking data is collected annually • Data is compiled and evaluated annually with established protocols • Evaluate inspections annually and throughout the permit term
Follow-up inspections for post-construction BMPs		

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BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 5-1d: Enforcement		
Define legal authority to control post-construction runoff	Completed in previous permits	<ul style="list-style-type: none"> Review if legal authority changes and revise as necessary
Refine protocol, guidance to be equivalent with applicable Ohio EPA CGP	Completed – latest revision December 2021	<ul style="list-style-type: none"> Review when future CGPs are released and update if necessary
Conduct enforcement actions, where applicable	On-Going	<ul style="list-style-type: none"> Tracking data is collected annually Data is compiled and evaluated annually with established protocols Evaluate annually and over the permit term
Develop an enforcement escalation policy	Completed	<ul style="list-style-type: none"> Periodic review of projects where escalated enforcement was necessary

Rationale and Decision Process (Part III.B.5.e)

- Uncontrolled runoff from developed land modifies natural hydrology and heightens pollutant transport, causing flooding, stream erosion, and habitat/water quality degradation.
- Permanent stormwater controls are installed most cost-effectively as part of a larger construction/development/re-development project.
- A strong, consistent program is imperative for a successful construction site stormwater control.
- The County utilizes a standard plan review and inspection checklist to ensure consistent application of County and state requirements. Retaining these completed checklists and plans will provide documentation of the program consistency regardless of project type or size.
- Existing site inspection program has been successful in completing construction projects with water quality protection as a priority.
- The County resolves issues identified during inspections through cooperation with site representatives and owners.
- When necessary, implementation of the enforcement escalation policy has proved successful and will continue into the future.
- A tracking system is available and used to track plan reviews and approvals, site inspections, and enforcement.

Rationale for Program Modifications

Modified to meet new small MS4 permit requirements related to documenting plan reviews/approvals and inspections.

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Program Area 5-2: Post-construction Stormwater Controls

Purpose

Implement structural and non-structural post-construction stormwater controls, with consideration of green infrastructure, within Co-Permittee MS4s discharging to a watershed(s).

Responsible Party/Implementation Partner(s) (Part III.B.5.e.vii)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
5-2a	Create strategy for program implementation	<ul style="list-style-type: none"> • Educate development community on green infrastructure practices • Evaluate alternatives • Develop strategy in coordination with Co-Permittees 	County	Co-Permittees
5-2b	Develop program guidance	<ul style="list-style-type: none"> • Prepare program guidance • Distribute guidance to Co-Permittees for comment • Finalize program guidance 	County	Co-Permittees
5-2c	Implement program and track progress	<ul style="list-style-type: none"> • Modify County regulations, if necessary • Implement post-construction BMPs in Co-Permittee MS4s • Track progress 	County	Co-Permittees

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

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Best Management Practices

The following BMPs, associated strategies, & mechanisms, established for program area.

BMP 5-2a: Create Strategy for Program Implementation

New requirements within the current permit include watersheds with a U.S. EPA. An educational opportunity to contractors, SWP3 designers, and/or employees on OHC000004. As well as one choice from an additional performance standard, of which the County will perform restoration of at least 300 linear feet of channelized stream where natural channel stability or floodplain restoration will reduce stream erosion. Throughout the current permit term, the County will also:

- Provide education on development community, in association with educational opportunities provided under MCM 1, and seek feedback on feasibility of implementing said controls within typical development projects
- Evaluate certain peak water quantity structures/controls installed before 2003, and determine feasibility of a retrofit for certain petitioned subdivisions within County boundaries
- Work with Co-Permittees to develop an overall compliance strategy and identify any potential projects compatible with the required controls
- Finalize the strategy and establish a schedule of projects implemented

BMP 5-2b: Develop Program

BMP 5-2c: Implement Program and Track Progress

- The County aims to incorporate considerations to developers and designers for Table 4b and other green infrastructure controls

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- Records of stream restoration construction documents are retained for recordkeeping and historical reference
- The County will continue a mutual relationship with all Co-Permittees to track the progress of the program and explore any and all avenues to evaluate the possibilities of retrofits and Table 4b practices

Measurable Goals, Milestones, and Evaluation Methods (Part III.B.5.5.e.viii)

The permit requires the MS4 to “evaluate the success of this minimum measure, including how you selected the measurable goals for each of theBMPs”

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 5-2a: Create Strategy for Program Implementation		
Provide education on green infrastructure	On-going	<ul style="list-style-type: none"> • Education and training opportunities provided • Track attendance at events/meetings • Record feedback on green infrastructure opportunities
Define implementation requirements	On-going	• Technical memorandum
Develop compliance strategy		• Track meeting minutes of County Commissioners/Co-Permittees
BMP 5-2b: Develop Program		
Identify project opportunities	On-going	• Technical memorandum(s)
Develop and distribute guidance materials		• Track meeting minutes of County Commissioners/Co-Permittees
BMP 5-2c: Implement Program and Track Progress		
Amend County regulations if necessary	April 1, 2026	<ul style="list-style-type: none"> • Lawrence County Commissioners approval documentation • Co-Permittee approval documentation
Implement selected projects	April 1, 2026	<ul style="list-style-type: none"> • Periodic progress meetings/reports • Project acceptance documentation

Rationale and Decision Process (Part III.B.5.e)

- Retrofit of post-construction controls into existing MS4s, and/or requirements that developers implement green infrastructure.

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Rationale for Program Modifications

BMP created to meet 2021 small MS4 permit requirements.

MCM 5 – Annual Reporting Requirements (Part III.B.5.f.vii)

MCM 5 Annual Reporting Requirements (Part III.B.5.f.vii)	
1.	Document the number of applicable sites in your jurisdiction requiring post-construction controls for the reporting year
2.	Document the number of pre-constructions SWP3 reviews and approvals for post-construction runoff controls
3.	Document the number of inspections verifying that post-construction runoff controls were built per requirements
4.	Document the number of enforcement actions taken for failure to adequately install post-construction runoff controls and the number of enforcement actions taken for failure to maintain
5.	Document the number of long-term O&M plans developed and agreements in place for post-construction runoff controls
6.	Document the number of long-term O&M inspections performed on post-construction controls (number performed by MS4 and number performed privately)
7.	Document the if applicable, summary of activities taken to satisfy your post-construction storm water management program TMDL performance standard

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Minimum Control Measure 6 - Pollution Prevention and Good Housekeeping

Introduction

The pollution prevention and good housekeeping for (county) operations MCM #6 is an important element of any jurisdiction's small MS4 program. Ideally, the goal is to reduce and prevent pollutant runoff from MS4 operations, covering activities such as owned and operated by the jurisdiction, fleet and building maintenance, MS4 maintenance, in addition to jurisdiction initiated new construction (road or bridge projects), and other initiated land disturbances. In order to ensure pollution does not occur from jurisdiction sponsored activities, Lawrence County must develop and implement an operation and maintenance (O&M) program with BMPs designed to address stormwater impairment.

As a result, Lawrence County must examine and alter its actions to help ensure a reduction in the amount and type of pollution that collects on to roads and streets, parking lots, open spaces, storage and vehicle maintenance areas, and is discharged into local waterways. Similarly, pollution that results from environmentally damaging land development and flood management practices or poor maintenance of existing storm sewers is released into the waterways. As a result, the pollution prevention and good housekeeping minimum control measure will address sources of pollution from all County-sponsored maintenance and development activities.

Effective small MS4 management programs begin with their own employees. It is because of this that pollution prevention and good housekeeping measures oblige Lawrence County to educate its staff on their and their employer's impact on water quality and what they can do to help.

Performance standards of this program include:

- Provide annual employee training.
- Maintain appropriate documented procedures, controls, maintenance schedules and recordkeeping
- Ensure salt piles covered with no run-on and subsequent run-off of salt and liquid road treatments with secondary containment or alternatively bollard or barrier protection completed no later than two (2) years after the effective date of this permit.
- Stabilize areas of soil disturbance associated with ditch/MS4 maintenance later than two (2) years after the effective date of this permit Annual Reporting requirements of this program include.
- Summary of employee training program(s) implemented, listing topics, the number of employees that attended each training.
- List of municipal facilities subject to your program with the number of facilities inspected and the frequency of such inspection
- Document the wastes properly disposed from your small MS4 and your municipal operations, including the disposal location
- Document whether your road salt storage is covered, tons of salt used, gallons of brine used (and concentration)

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- Document the gallons used of pesticides and herbicides and measures taken to minimize usage
- Document the pounds used of fertilizer and measures taken to minimize usage
- Document the amount of catch basin cleaning material collected and properly disposed, including disposal allocation.

Program Areas

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

Program Area 6-1: Operation and Maintenance Program for Government Facilities

Cost-effectively prevent illicit discharges and minimize storm water pollution at government facilities.

Program Area 6-2: Operation and Maintenance Program for Government Field Operations

Cost-effectively prevent illicit discharges and minimize storm water pollution during government field activities.

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Program Area 6-1: Operation and Maintenance Program

Purpose

Cost-effectively prevent illicit discharges and minimize storm water pollution at government facilities.

Responsible Party/Implementation Partner(s) (Part III.B.6.d.iv)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
6-1a	Employee Training Program	<ul style="list-style-type: none"> Train employees on MS4 requirements during facility visits and other times/locations 	County	Co-Permittees
6-1b	Operation and Maintenance Program	<ul style="list-style-type: none"> Prepare O&M Plans for MS4 facility operations Implement O&M Plans at each MS4 facility Conduct visits to MS4 facilities to assess plan implementation Track use and disposal of permit listed materials for each MS4 facility 	County & Co-Permittees	Co-Permittees

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

Best Management Practices

The following BMPs, associated strategies, and mechanisms are established for this program area:

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BMP 6-1a: Employee Training

The permit requires employee training to prevent and reduce storm water pollution from activities such as park and, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. The County will continue to provide MS4 employee training and annual facility visits to meet permit requirements. Training will focus on:

- Physical and administrative controls that can be implemented at MS4 facilities and during field operations to reduce the likelihood of polluted runoff reaching the MS4 and local waterways.
- Maintenance schedules for controls being implemented at their facilities.
- Identification of illicit discharges and sources and mechanisms for reporting potential discharges (in association with training requirements under MCM3).
- Recordkeeping and documentation protocols.
- Topics related to other programs such as MS4 mapping, and construction site sediment and erosion control. Training of MS4 employees who are frequently in the field about other programs has resulted in increased reporting of potential issues.

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BMP 6-1b: Operation and Maintenance Program

The permit requires a list of industrial facilities you own or operate, and Storm Water Pollution Prevention Plans (SWP3s) for municipal facilities subject to this program. The facilities subject to these permit requirements is shown below:

MCM 6 - MS4 Regulated Facilities (Part III.b.6.c)		
Facility	Address	Type
Fayette Township Maintenance Department	681 County Road 1, South Point, OH	MS4
Perry Township Maintenance Department	4633 State Route 243 Ironton, OH	MS4
Rome Township Maintenance Department	9644 County Road 107, Proctorville, OH	MS4
Union Township Maintenance Department	66 County Road 3, PO Box 248, Chesapeake, OH	MS4

This inventory is updated to include new facilities and remove permanent closed facilities.

The County is committed to operating its municipal facilities in a manner that is protective of surface water quality. For facilities not requiring a separate NPDES Industrial Permit that conduct activities described in 40 CFR 122.26 (b) (14) such as vehicle maintenance facilities, fueling stations, salt storage, waste transfer stations, composting facilities, and bus terminals, a stormwater pollution prevention plan (SWPPP), must be developed and implemented using the industrial permit SWPPP as a guide. Each facility SWPPP consists of a form set that defines the operation and maintenance (O&M) plan for municipal facilities. The flexible format of the facility SWPPP allows for creation of individualized O&M programs for each municipal facility. A completed facility SWPPP form set documents onsite operations; types and quantities of materials stored and used; areas with high potential for spills; and controls being implemented to reduce the likelihood of polluted runoff from municipal facilities. Each facility SWPPP includes maps showing facility layout, locations of operations and materials, locations of floor drains and storm drains in relation to operational areas and stored materials, drainage directions, local waterways, and outfalls. Maps are included in the facility SWPPP and updated as necessary to accommodate changes. The facility SWPPP includes a set of assessment forms for each type of operation at the facility. These are completed during facility walkthroughs to evaluate and document performance of controls being used to reduce polluted runoff emanating from the facility. Facility SWPPPs are updated for each MS4 facility at least once a year.

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Measurable Goals, Milestones, and Evaluation Methods (Part III.B.6.d.v)

The permit requires the MS4 to “evaluate the success of this minimum measure, including how you selected the measurable goals for each of theBMPs”

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 6-1a: Employee Training		
Train Applicable Employees	Annually	<ul style="list-style-type: none"> Tracking data is collected annually Data is compiled and evaluated annually during preparation of the annual report
BMP 6-2b: Operation and Maintenance Program		
Prepare the O&M Program (i.e. Facility SWPPP) for government facilities	On-Going	<ul style="list-style-type: none"> Plan reviews are conducted annually and revised as appropriate Facility walkthroughs are performed to verify plan implementation Plans are updated as necessary to incorporate changes at the facility, materials are stored and used, active controls, and recommendations
Implement O&M Plans (i.e. Facility SWPPP)	On-Going	<ul style="list-style-type: none"> Facility SWPPP plans are reviewed annually at the time of facility walkthroughs to verify controls are being implemented Co-permittees are provided with recommendations for any issues identified during the walkthrough, which are documented in the Facility SWPPP
Perform facility walkthroughs to reinforce plan and training	Annually	<ul style="list-style-type: none"> Co-permittees participate in annual walkthrough to assess implementation of plan controls Co-permittees are provided with recommendations for any identified issues, which are documented in the Facility SWPPP Annual visits are tracked and documented by the County for annual report preparation
Track and document usage and disposal of MS4 facility materials	On-Going, reported annually	<ul style="list-style-type: none"> Tracking information is collected and reviewed as part of the annual report preparation

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Rationale and Decision Process (Part III.B.6.d)

The annual training and O&M Program were developed with the following rationale:

- The County has found that training MS4 employees who are frequently in the field about other programs has resulted in increased reporting of potential issues.
- MS4 employees who are aware of the potential impacts of their actions on the MS4 and local waterways are more likely to act in a manner to reduce the likelihood of these actions.
- The County has seen a positive correlation between IDDE training and reporting of potential illicit discharges.
- A comprehensive facility SWPPP program is applied across all Co-Permittee jurisdictions and provides consistency in field-based operations best management practices and program performance.

Rationale for Program Modifications

Employee Training and Facility SWPPP was implemented previously and will continue. Annually facility inspections addressed in permit.

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Program Area 6-2: Operation and Maintenance Program for Government Field Operations

Purpose

Cost-effectively prevent illicit discharges and minimize storm water pollution during government field activities.

Responsible Party/Implementation Partner(s) (Part III.B.6.d.v)

Program Area BMPs, Mechanisms, and Responsible Parties Overview				
BMP#	BMP Name	Mechanism (s)	Responsible Party	Implementation Partners
6-2a	Employee Training Program	<ul style="list-style-type: none"> Train employees on MS4 requirements during facility visits and other times/locations 	County	Co-Permittees
6-2b	Operation and Maintenance Program	<ul style="list-style-type: none"> Prepare O&M Plans for MS4 field operations Implement O&M Plans for field operations at each MS4 facility Conduct visits to MS4 facilities to assess plan implementation County and Co-permittees may perform catch basin cleaning, or leaf/yard waste collection on annually. Track use and disposal of permit listed materials for each MS4 facility 	County, Co-Permittees	Co-Permittees
6-2c	Road Salt Application Program	<ul style="list-style-type: none"> Prepare Road Salt Application Plan for each co-permittee that documents rationale for road salt application rates and methods, identifies controls and practices for minimization of road salt usage on roadways and parking lot operations. 	County, Co-Permittees	Co-Permittees

Program Elements

The following program elements are established in order to meet the small MS4 permit requirements and performance standards.

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Best Management Practices

The following BMPs, associated strategies, and mechanisms are established:

BMP 6-2a: Employee Training

The permit requires employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. The County will continue to provide MS4 employee training and annual facility visits to meet permit requirements. Training will focus on:

- Physical and administrative controls that can be implemented at MS4 facilities and during field operations to reduce the likelihood of polluted runoff reaching the MS4 and local waterways.
- Maintenance schedules for controls being implemented at their facilities.
- Identification of illicit discharges and sources and mechanisms for reporting potential discharges (in association with training requirements under MCM3).
- Recordkeeping and documentation protocols.
- Topics related to other programs such as MS4 mapping, and construction site sediment and erosion control. Training of MS4 employees who are frequently in the field about other programs has resulted in increased reporting of potential issues.

BMP 6-2b: Operation and Maintenance Program

The permit requires the following activities be addressed:

- Controls to reduce floatable and other pollutants
- Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, salt/sand handling and storage locations and snow disposal areas you operate. A description of the materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc. or combination thereof), associated application rates, and the rationale for the selected application rates shall be included. Also identify controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities.
- Procedures for the proper management and disposal of waste removed from your small MS4 and your municipal operations.
- Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices.

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The County is committed to conducting its field operations in a manner that is protective of surface water quality. The Facility SWPPP program, described in Program Area 6.1, includes forms for field operations. The facility SWPPP identifies field activities performed out of each facility in the MS4 inventory and practices to implement to reduce the likelihood of introducing polluted runoff into the MS4 and local waterways while these activities are being conducted.

The Facility SWPPP includes a set of assessment forms for each type of field operation performed by employees. These forms are reviewed and updated at least once a year to evaluate performance of identified practices. Facility SWPPPs are updated for each MS4 facility at least once a year. Co-Permittees will track and document salt and brine use; pesticide, herbicide and fertilizer use, quantities and locations of materials collected and disposed during street sweeping, catch basin cleaning, and MS4 maintenance. Procedures will be revised to meet the new stabilization timeframes for soil disturbances during ditch and MS4 maintenance.

BMP 6-2c: De-icing Materials Application Program

The permit requires the following activities be addressed:

- Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, salt/sand handling and storage locations and snow disposal areas you operate. A description of the materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc. or combination thereof), associated application rates, and the rationale for the selected application rates shall be included. Also identify controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities.

The County is committed to minimize its application of de-icing in a manner that improves surface water quality. This involves placement of de-icing materials (i.e. road salt and brine) in a manner that placed the right amount of material, in the right locations, and at the right time.

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Measurable Goals, Milestones, and Evaluation Methods (Part III.B.6.d.v)

The permit requires the MS4 to “evaluate the success of this minimum measure, including how you selected the measurable goals for each of theBMPs”

BMP/Measurable Goals	Schedule Milestone	Evaluation Methods
BMP 6-2a: Employee Training		
Train Applicable Employees	Annually	<ul style="list-style-type: none"> Tracking data is collected annually Data is compiled and evaluated annually during preparation of the annual report
BMP 6-2b: Operation and Maintenance Program		
Prepare the O&M Program (i.e. Facility SWPPP) for government facilities	On-Going	<ul style="list-style-type: none"> Plan reviews are conducted annually and revised as appropriate Facility walkthroughs are performed to verify plan implementation Plans are updated as necessary to incorporate changes at the facility, materials are stored and used, active controls, and recommendations
Implement O&M Plans (i.e. Facility SWPPP)	On-Going	<ul style="list-style-type: none"> Facility SWPPP plans are reviewed annually at the time of facility walkthroughs to verify controls are being implemented Co-permittees are provided with recommendations for any issues identified during the walkthrough, which are documented in the Facility SWPPP
Perform facility walkthroughs to reinforce plan and training	Annually	<ul style="list-style-type: none"> Co-permittees participate in annual walkthrough to assess implementation of plan controls Co-permittees are provided with recommendations for any identified issues, which are documented in the Facility SWPPP Annual visits are tracked and documented by the County for annual report preparation
Track and document usage and disposal of MS4 facility materials	On-Going,	Reported Annually
		<ul style="list-style-type: none"> Tracking information is collected and reviewed as part of the annual report preparation

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	Schedule Milestone	Evaluation Methods
BMP 6-2c: De-icing Materials Application Program		
Prepare De-icing Materials Application Plan and Review Annually	Annually	<ul style="list-style-type: none"> De-icing Materials Application Plans will be prepared for each co-permittee after 2021-2022 season and evaluated. Co-permittees will be provided recommendations during each annual review to reduce de-icing material usage (i.e. Road Salt and Brine).
Track and document usage of de-icing materials	On-going, annually reported	<ul style="list-style-type: none"> Tracking information is collected and reviewed as part of the annual report preparation

Rationale and Decision Process (Part III.B.6.d)

The annual training and O&M Program were developed with the following rationale:

- The County has found that training MS4 employees who are frequently in the field about other programs has resulted in increased reporting of potential issues.
- MS4 employees who are aware of the potential impacts of their actions on the MS4 and local waterways are more likely to act in a manner to reduce the likelihood of these actions.
- The County has seen a positive correlation between IDDE training and reporting of potential illicit discharges.
- A comprehensive facility SWPPP program is applied across all Co-Permittee jurisdictions and provides consistency in field-based operations best management practices and program performance.
- Development of a De-icing Materials Application Program provide a rational method to ensure the right amount of de-icing materials, is placed at the right rate for effective de-icing, at the right time for maximum effectiveness.

Rationale for Program Modifications

The program will be modified to meet new permit requirements related to stabilizing disturbed earth during MS4 maintenance. The program has also has been modified to provide greater focus on reducing use of de-icing materials.

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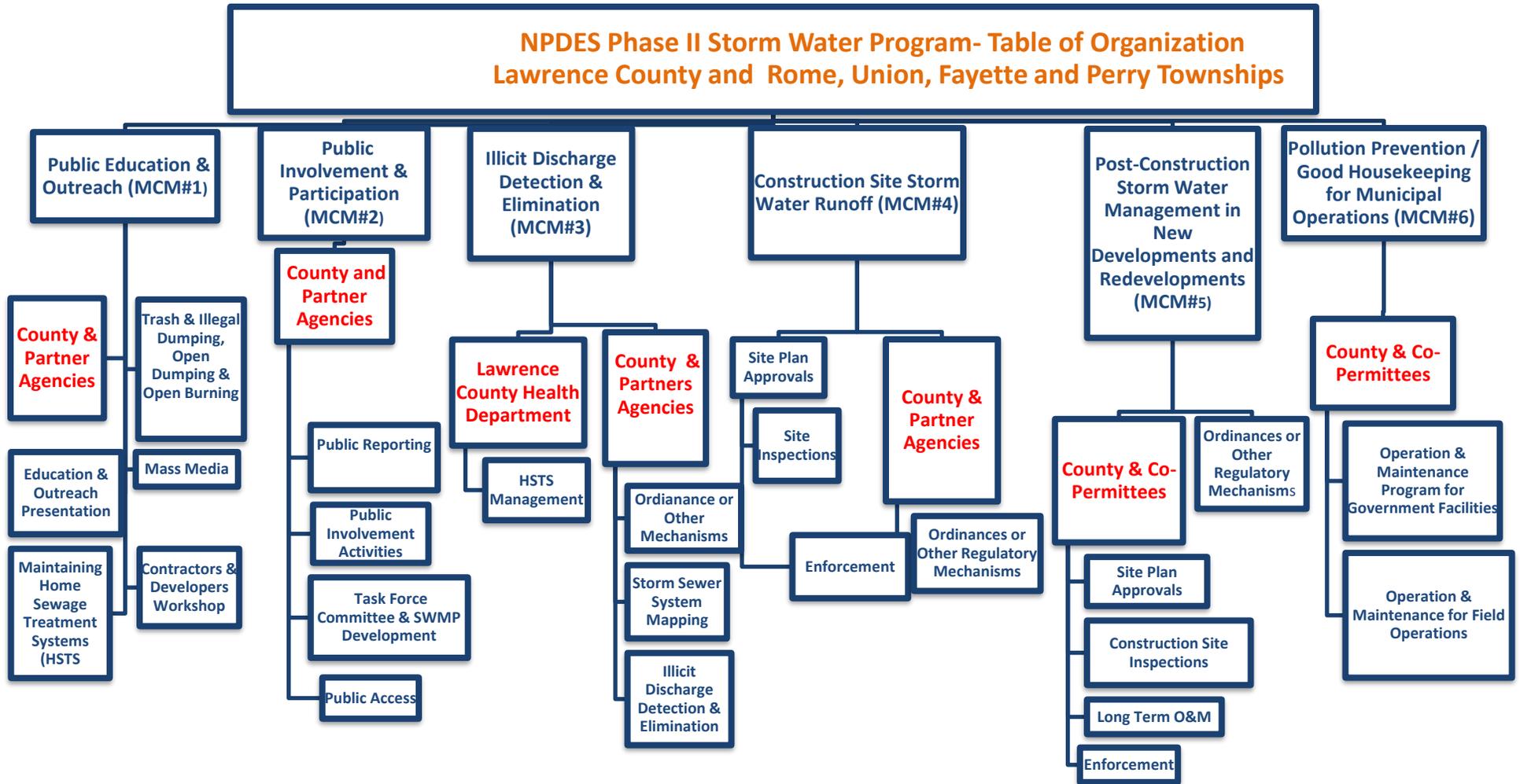
MCM 6 – Annual Reporting Requirements (Part III.B.6.e.vii)

MCM 6 - Annual Reporting Requirements (Part III.B.6.e.vii)	
1.	Summarize employee training program(s) implemented, listing topics, target pollutants and the number of employees that attended each training.
2.	List the MS4 municipal facilities subject to your program with the number of facilities inspected and the frequency of such inspections.
3.	Document the amounts of wastes properly disposed from each small MS4s and your municipal operations, including the disposal locations.
4.	Document whether each MS4s road salt storage is covered, tons of salt used, gallons of brine used (and concentration), lane miles treated and measures taken to minimize usage.
5.	Document the gallons used of pesticides and herbicides and measures taken to minimize usage in each MS4.
6.	Document the pounds used of fertilizer and measures taken to minimize usage in each MS4.
7.	Document the amount of and catch basin cleaning material collected and properly disposed, including disposal locations in each MS4.
8.	Summarize any new or existing flood management projects that were assessed for possible impacts on water quality in each MS4.
9.	Lawrence County has up-to-date regulations (FEMA approved) that are enforced across all unincorporated areas in the County.

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 Co-Permittees - Storm Water Task Force Committee Members

OFFICE POSITION	Committee Members	Contact Information
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Citizen Volunteer (3)	Doug Marcum J.B. Finlay Heather Ervin	P.O. Box 278 Chesapeake, OH 45619 doug@marcumpump.com 471 Twp. Rd. 1525 Proctorville, OH 45669 127 Township Road 1363 Chesapeake, OH 45619
Co-Permittees PERRY TOWNSHIP ROME TOWNSHIP UNION TOWNSHIP FAYETTE TOWNSHIP	George W. Rowe – Perry - Trustee Brian Pinkerman – Rome Trustee Bob Mayo – Rome Trustee Cole Webb – Union Trustee Mike Jones – Fayette Trustee	5127 SR 243 Ironton, OH 45638 1296 Twp. Rd. 172 N Proctorville, OH 45669 brianpinkerman@aol.com 19 Prvt. Dr. 8750, CR 107 Proctorville, OH 45696 bmayokitchens@hotmail.com 62 Pvt. Dr. 127 Chesapeake, OH 45619 BacgoAlie12@yahoo.com 1688 Co. Rd. 144 South Point, OH 45680
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LAWRENCE COUNTY AND OTHERS
STORM WATER MANAGEMENT PROGRAM PLAN



APPENDIX C: LAWRENCE COUNTY AND OTHERS URBANIZED AREA MAP

