

Storm Water Management Plan

(updated 2010)



Lawrence County

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Executive Summary

Lawrence County is required to submit a storm water management program in accordance with 40 CFR Part 122.32 and Ohio Law. The document outlines Lawrence County's plan to develop, implement, and enforce a storm water management program designed to reduce pollutants to the maximum extent practicable, to protect water quality, and to satisfy the appropriate requirements of the Clean Water Act. The storm water management program addresses the six minimum control measures as required by the Ohio EPA Phase II program. The Notice of Intent and Storm Water Management Program was submitted on March 6, 2003. The Notice of Intent for renewal coverage was submitted April 2009.

Legal Authority

Under section 6111 of the Ohio Revised Code, the Lawrence County Commissioners have both the fiscal authority and legal resources to fully implement the storm water management plan.

Permit Coverage

The storm water management plan covers only about 1/8 of Lawrence County along the Ohio River. The overall population of Lawrence County is 62, 400. The population in the urbanized area is around 7,000 people. There are 13.6 square miles in the urbanized area.

Reporting Requirements

Lawrence County will submit its required report annually during the first term of the permit cycle. The report will include the status of compliance with the permit conditions, an assessment of the appropriateness of the BMPs, progress toward achieving the goal of reducing the discharge of pollutants to the maximum extent practicable, and progress toward achieving the measurable goals for each of the six minimum control measures. A summary of the activities that Lawrence County will undertake during the next reporting cycle and any proposed changes to BMPs or measurable goals will be included in the annual report.

Storm Water Management Program

The plan outlines the six minimum control measures which are expected to result in a significant reduction in pollutants discharged by Lawrence County. Some identifiable water quality pollutants are runoff from home septic systems, oil, gas and antifreeze from cars in parking lots, fertilizer from gardens and lawns, and sediment from construction activities. The six minimum controls will address identifiable water quality pollutants. Each measure will be addressed separately.

**Minimum Control Measure #1:
Public Education and Outreach on Storm Water Impacts**

Lawrence County 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. The Lawrence Soil and Water Conservation District will be responsible for the overall management and implementation of this program.

The storm water public education and outreach program will target the general public, schools, maintenance employees, and contractors/developers. The general public should have an understanding of storm water runoff and how it can affect them. Roof runoff, lawn care, household pollutants, etc. can impact the water quality which can affect individuals by increasing the fees on the water bill due to increased costs to clean the water they drink. By targeting schools, you are providing children with information that they also share with their teachers and take home to their parents. If reached at a younger age, the students may have more of an influence over the activities carried out in their household and for the rest of their lives. Maintenance employees are working on the roadways to keep them safe and passable for residents. This requires equipment and materials. The employees need to be trained on best management practices that can be used while performing maintenance, at their storage facility and on the roads. Contractors/Developers are physically altering the land which means they are creating the potential for runoff. This group needs to be aware of this potential, what problems it can cause and what best management practices they can use to help prevent this problem.

The overall goal of the public education and outreach program is to increase the knowledge of the targeted audience about the sources of storm water runoff and the impact it has on water quality to help them make informed decisions about best management practices for their home or work. The target pollutant sources of the program are sediment/erosion, sewage treatment, oils/greases, lawn and garden, rooftop runoff and road runoff (impervious surfaces).

We plan to reach our targeted audience through the use of brochures, fact sheets, newspaper and/or newsletter articles, public service announcements, a website, workshops, seminars, school programs and displays at events. Our goal is to reach at least 50 percent of the population (about 5,000 people) over the permit term.

To determine the success of this measure, evaluations will be handed out at presentations for the public and in school classrooms. These will determine number of people reached and the level of knowledge about the subject before and after the presentations. We will track the number of informational materials handed out at events. We currently do not have a hit tracker on the website but could possibly add this in the future. We will track the number of articles submitted to newspapers/newsletters and number of public service announcements but are unable to track the number of readers or listeners.

Measurable goals for Minimum Control Measure #1

BMP Number	BMP	Description of BMP	Year 1 Goals	Year 2 Goals	Year 3 Goals	Year 4 Goals	Year 5 Goals
1	Mass Media	Brochures, fact sheets, newspapers, newsletters, website and public service announcements will be used to provide information to the targeted audience (general public, schools, maintenance employees and contractors/developers) about the targeted pollutant sources (sediment/erosion, sewage treatment, oils/grease, lawns and gardens, rooftop runoff and road runoff).	<ol style="list-style-type: none"> 1. Distribute five brochures or fact sheets at events throughout year. 2. Three articles will be written and submitted for print in local newspapers and/or local newsletters. 3. Maintain website 	<ol style="list-style-type: none"> 1. Distribute five brochures or fact sheets at events throughout the year. 2. Three articles will be written and submitted for print in local newspapers and/or local newsletters. 3. Develop a public service announcement for print or radio. 4. Fact sheet developed and distributed specifically about illicit discharges and the IDDE program. 5. Maintain website. 	<ol style="list-style-type: none"> 1. Distribute five brochures or fact sheets at events during the year. 2. Three articles will be written and submitted for print in local newspapers and/or local newsletters. 3. Maintain website. 4. PSA for print or radio. 	<ol style="list-style-type: none"> 1. Distribute brochures or fact sheets at events during the year. 2. Three articles will be written and submitted for print in local newspapers and/or local newsletters. 3. Maintain website. 4. PSA for print or radio. 	<ol style="list-style-type: none"> 1. Distribute five brochures or fact sheets at events during the year. 2. Three articles written and submitted for print in local newspapers and/or local newsletters. 3. Maintain website. 4. PSA for print or radio.

BMP Number	BMP	Description of BMP	Year 1 Goals	Year 2 Goals	Year 3 Goals	Year 4 Goals	Year 5 Goals
2	Presentations	Workshops, seminars, displays at events and programs will be available to targeted audience (general public, schools, maintenance employees and contractors/developers) and focus on the targeted pollutant sources (sediment/erosion, sewage treatment, oils/grease, lawns and gardens, rooftop runoff and road runoff).	1. Displays at three public events throughout the year. 2. Eight school and civic group programs. (Two public and six school) 3. Host one pollution control / BMP workshop for contractors/ developers. 4. Provide training to maintenance employees on good housekeeping techniques.	1. Displays at three public events throughout the year. 2. Eight school and civic group programs throughout year. (Two public and six school) 3. Host one pollution control / BMP workshop for contractors/ developers. 4. Provide training to maintenance employees on good housekeeping techniques.	1. Displays at three public events throughout the year. 2. Eight school and civic group programs throughout year. (Two public and six school) 3. Host one pollution control / BMP workshop for contractors/ developers. 4. Provide training to maintenance employees on good housekeeping techniques.	1. Displays at three public events throughout the year. 2. Eight school and civic group programs throughout year. (Two public and six school) 3. Host one pollution control / BMP workshop for contractors/ developers. 4. Provide training to maintenance employees on good housekeeping techniques. 5. Workshop on home sewage system operation and maintenance.	1. Displays at three public events throughout the year. 2. Eight school and civic group programs throughout year. (Two public and six school) 3. Host one pollution control / BMP workshop for contractors/ developers. 4. Provide training to maintenance employees on good housekeeping techniques.

Minimum Control Measure #2: Public Involvement / Participation

Lawrence County believes that the public should be given opportunities to play an active role in the implementation of the storm water program. An active and involved community is crucial to the success of the storm water management program. Citizens who participate in the development and decision making process become partially responsible for the program and may be less likely to raise legal challenges. In order to involve the public in the development and implementation of the plan, public meetings will be offered, especially when changes are planned or resolutions are to be adopted. This will allow for the public to comment on said changes and proposed resolutions. Notice will be given to the newspapers and posted on the storm water management program website.

The public involvement/participation program will target the general public, civic organizations, public officials and businesses. Overall the economic background in Lawrence County is poor. According to the 2000 census information, 18.9% of the population was below the poverty line. The population of Lawrence County is around 62,500. A majority of the people in Lawrence County are white (95.5%) with black persons in the 2.5% range. Persons with two or more different races were in the 1% range and Hispanic, Asian and American Indian and Alaska Native are less than 1% each.

The main focus of this measure will be the general public. This audience makes up the majority of the population. Civic groups in Lawrence County include the Symmes Creek Restoration Committee and Operation Tidy-up Lawrence County, which are passing along the message of conservation and preservation. These two groups organize cleanup events in the community and involve the public in their message of getting rid of the trash for a cleaner, safer community. The Symmes Creek Restoration Committee is a group that focuses on cleaning up trash and debris from Symmes Creek, a tributary of the Ohio River. They hold clean up events a couple of times per year along the banks of the creek. Operation Tidy-up Lawrence County is housed in Union and Rome Townships and focuses on cleaning up trash along the roadways. ORSANCO holds the Ohio River Sweep once per year with local organization from the Solid Waste Management District. Members of the general public, schools, civic groups and businesses participate in the event. By educating these groups about storm water runoff and helping to promote these events, we hope they will incorporate that message into their overall goals.

Lawrence County has several waste disposal programs available to citizens, including the pesticide disposal program (occasional), recycling collection trailers set at various locations in the County and a household hazardous waste collection event. These programs help to improve public education, encourage public participation and educate the public about the importance of recycling. The recycling trailers are available all year long, while the hazardous waste collection is held once a year.

The formation of a Storm Water Task Force will create a more involved public and a greater awareness of the storm water management program. The SWTF will consist of three (3) citizen volunteers, one (1) County Commissioner, four (4) Trustees (one from each Township

covered by the plan), one (1) representative from any Village that adopts the plan, one (1) County Engineer, and one (1) Soil and Water Conservation District representative who will meet quarterly to receive comments, questions, and/or concerns about the storm water program. This task force will develop a protocol for receiving and giving answers to such comments, questions, and concerns.

We plan to reach the targeted audience through the advertisement of public meetings, promotion of stream and roadside cleanup events, encouragement of participation in a storm drain marking program, and tracking comments, questions and/or concerns about the program. These events and strategies will help us to increase the knowledge of the public and others about the storm water management program and the sources and impacts of storm water runoff on water quality. This will hopefully lead to these groups spreading that message.

To evaluate the success of this minimum measure, attendance will be taken at the different events held and if applicable, the number/amount of trash collected. Attendance will also be kept at the Storm Water Task Force meetings along with a record of the questions, comments, and/or concerns addressed at storm water meetings.

The Lawrence Soil and Water Conservation District is responsible for the overall management and implementation of this measure.

Measurable goals for Minimum Control Measure #2

BMP Number	BMP	Description of BMP	Year 1 Goals	Year 2 Goals	Year 3 Goals	Year 4 Goals	Year 5 Goals
1	Storm Drain Marking	Using a standardized marker that says, “Do Not Dump, Drains to Waterways”, storm drains in the urbanized area will be marked.	20% of storm drains stenciled.	40% of storm drains stenciled.	60% of storm drains stenciled.	80% of storm drains stenciled.	100% of storm drains stenciled.
2	Recycling and Litter Prevention Events	Promotion of stream cleanup events sponsored by Symmes Creek Restoration Committee and ORSANCO. The utilization of recycling trailers and a household hazardous waste collection. SWCD will encourage public involvement in the events by advertising on the storm water website and its newsletter.	<ol style="list-style-type: none"> 1. To promote stream cleanup events. 2. To promote the use of recycling trailers and participation in the household hazardous waste collection. 	<ol style="list-style-type: none"> 1. To promote stream cleanup events. 2. To promote the use of recycling trailers and participation in the household hazardous waste collection. 	<ol style="list-style-type: none"> 1. To promote stream cleanup events. 2. To promote the use of recycling trailers and participation in the household hazardous waste collection. 	<ol style="list-style-type: none"> 1. To promote stream cleanup events. 2. To promote the use of recycling trailers and participation in the household hazardous waste collection. 	<ol style="list-style-type: none"> 1. To promote stream cleanup events. 2. To promote the use of recycling trailers and participation in the household hazardous waste collection.
3	Storm Water Task Force	The Storm Water Task Force will consist of local agencies, elected officials, and citizen volunteers to address comments and concerns about the storm water management program.	Advertise for citizen volunteers to form a panel. Develop protocol.	Hold four public meetings to discuss / address problems or concerns with program.	Hold four public meetings.	Hold four public meetings.	Hold four public meetings.

Minimum Control Measure #3: Illicit Discharge Detection and Elimination

The illicit discharge detection and elimination program in Lawrence County will work towards detecting and eliminating illicit discharges while providing education on the importance of eliminating these detected discharges.

The County plans to develop a map of the storm sewer systems in Lawrence County since all illicit discharges must be located and corrected. This map will show locations of outfalls and the name and location of the water bodies of the state that they discharge into. Although limited GIS information is available, it would be the best method to use for mapping and documentation of illicit discharge sites. Currently the map is being developed using a hand-held GPS unit and documentation of coordinates. The map is being developed using drive-by sightings, local officials' information, and complaints. The locations are being verified by going to the site and taking pictures, drawing sketches and using GPS coordinates. The Soil and Water Conservation District, in cooperation with other agencies, will be responsible for locating and mapping illicit discharges, including illegal dumping and spills. The map will be updated at least once a year by checking and verifying new locations. The best time for implementing this measure would be during dry weather seasons since it will be easier to detect illicit discharges. The Storm Water Task Force will be responsible for developing strategies for the correction of illicit discharges. They will also be responsible for developing a procedure to trace the source and remove illicit discharges.

In Lawrence County, one of the main issues is proper home sewage treatment and disposal. The local health department will be responsible for compiling a list of all home sewer treatment systems, including addresses and a map showing the location of the home sewer treatment systems that discharge into the water bodies of the state.

The Storm Water Task Force will determine a priority area to study for illicit discharge detection, elimination, and mapping. Once the process is developed, the Soil and Water District will prioritize additional areas to study for illicit discharge detection. The Storm Water Task Force will develop a protocol for the evaluation and assessment of this measure. This could include such things as attendance at trainings and evaluations for pre and post assessment at these trainings. Outcomes of dry weather screenings will also assist in determining if this measure has been successful.

The Storm Water Task Force will be responsible for developing an ordinance/resolution prohibiting illicit discharges in the urbanized area in the County. They will also be responsible for creating enforcement procedures and actions for violations of the ordinance/resolution.

Public education is a critical component to be addressed in the illicit discharge detection and elimination measure. A fact sheet explaining the importance of illicit discharge detection will be developed and publicized immediately in the first priority area. This will hopefully improve the communities' acceptance of the illicit discharge detection program. Information will also be provided on the implications of illegal dumping and improper waste disposal. In addition, training will be provided to home owners on septic system operation and maintenance. In past years, certain local businesses would collect used oil and anti-freeze, there is a need to further research the availability of disposal sites for these potential pollutants. As part of the educational component, used oil and anti-freeze disposal will be researched. Once researched, a program will be developed to address oil and anti-freeze disposal.

Measurable goals for Minimum Control Measure #3

BMP Number	BMP	Description of BMP	Year 1 goals	Year 2 goals	Year 3 goals	Year 4 goals	Year 5 goals
1	Ordinance or other regulatory mechanism	An ordinance or other regulatory mechanism that prohibits illicit discharges into the storm sewer system and the implementation of appropriate enforcement procedures.	Formation of the Storm Water Task Force to assist with the development of the regulatory mechanism.	Adoption of regulatory mechanism by authorized agent.	Enforcement of mechanism.	Enforcement of mechanism.	Enforcement of mechanism.
2	Storm Sewer System Map	A comprehensive storm sewer system map will show the locations of all outfalls and the names and locations of all surface waters of the State that receive discharges from those outfalls.	Development of a storm sewer system map.	Development of a storm sewer system map.	Development of a storm sewer system map.	Development of a storm sewer system map.	Development of a storm sewer system map.
3	HSTS Mapping and List	A list and a map of all HSTSs shall be developed to determine systems that are not operating as designed or intended.	Development of a list of HSTSs and a map of those locations.	Development of a list of HSTSs and a map of those locations.	Development of a list of HSTSs and a map of those locations.	Development of a list of HSTSs and a map of those locations.	Development of a list of HSTSs and a map of those locations.
4	Illicit Discharge Detection and Elimination Plan	The Storm Water Task Force will develop procedures for detecting and addressing the issue of illicit discharges.	Formation of a Storm Water Task Force to assist with development of the IDDE Plan.	Development and adoption of an IDDE Plan.	Implementation of an IDDE Plan.	Implementation of an IDDE Plan.	Implementation of an IDDE Plan.
5	Dry Weather Screenings of Outfalls	Dry weather screening allows for the investigation and detection of the source(s) of contamination in outfalls.	Monitor outfalls with dry weather screenings.	Monitor outfalls with dry weather screenings.	Monitor outfalls with dry weather screenings.	Monitor outfalls with dry weather screenings.	Monitor outfalls with dry weather screenings.

**Minimum Control Measure #4:
Construction Site Storm Water Runoff Control**

Lawrence County recognizes that construction sites can deposit a significant amount of sediment in a short period of time. The resulting siltation, and the contribution of other pollutants from construction sites, can cause physical, chemical, and biological harm to our water bodies. A Storm Water Task Force will be formed to establish storm water, erosion and sediment control regulatory mechanisms, the requirements for the implementation of BMPs, and the enforcement mechanisms used for compliance (fines, bonding requirements, etc.). The regulatory mechanisms will apply to all new construction sites and redevelopment areas including commercial, industrial, and residential that would disturb greater than or equal to one acre of land. Reduction of pollutants in storm water discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development.

The Storm Water Task Force will be responsible for developing a site plan review process for construction plans. This process will consider potential water quality impacts on new construction sites and redevelopment areas. The SWTF will also be responsible for developing a site inspection and enforcement process that will include sanctions to ensure compliance.

As part of the public involvement / participation measure, the Storm Water Task Force will address information submitted by the public. The SWTF will establish procedures for receipt and consideration of all storm water related information which will include a tracking system for complaints filed and measures taken to resolve the complaint.

The Storm Water Task Force will establish a protocol to track number of plans reviewed and approved, number of sites inspected, and number of enforcement cases. This tracking system will be used to evaluate how well the goals of this measure are being met. Ultimately, the best way to measure the success of this measure is to monitor the quality of the effected streams but due to unavailability of resources this cannot be done at this time.

The Lawrence Soil and Water Conservation District is the responsible party for the overall management and implementation of this program. The Lawrence County Commissioners are responsible for passing regulatory mechanisms.

Measurable Goals for Minimum Control Measure #4

BMP Number	BMP	BMP Description	Year 1 goals	Year 2 goals	Year 3 goals	Year 4 goals	Year 5 goals
1	Ordinance or other regulatory mechanism	The mechanism used to require erosion and sediment controls at construction sites.	Establish a Storm Water Task Force to assist with development of regulatory mechanisms.	Adopt and implement a regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.
2	Sediment and Erosion Control Requirements	Requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites.	Storm Water Task Force will assist with the development of the regulatory mechanism that will include these requirements.	1. Requirements will be included in the regulatory mechanism adopted by the MS4. 2. Implement the regulatory mechanism.	Implement the regulatory mechanism.	Implement the regulatory mechanism.	Implement the regulatory mechanism.
3	Complaint Process	Procedures for receipt and consideration of information submitted by the public.	Storm Water Task Force will develop a protocol for complaints.	Implement protocol.	Implement protocol.	Implement protocol.	Implement protocol.
4	Site Plan Review Process	Procedures for pre-construction storm water pollution prevention plan review which incorporate consideration of potential water quality impacts.	Storm Water Task Force will assist with the development of regulatory mechanism that will include a provision for this process.	1. Implement regulatory mechanism. 2. Review 100% of plans submitted.	1. Implement regulatory mechanism. 2. Review 100% of plans submitted.	1. Implement regulatory mechanism. 2. Review 100% of plans submitted.	1. Implement regulatory mechanism. 2. Review 100% of plans submitted.

5	Site Inspection Procedures	Procedures for site inspection and enforcement control measures.	Storm Water Task Force will develop a protocol for site inspection procedures. They will also assist with development of a regulatory mechanism for enforcement.	<ol style="list-style-type: none"> 1. Follow protocol for site inspection. 2. Implement regulatory mechanism. 	<ol style="list-style-type: none"> 1. Follow protocol for site inspection. 2. Implement regulatory mechanism. 	<ol style="list-style-type: none"> 1. Follow protocol for site inspection. 2. Implement regulatory mechanism. 	<ol style="list-style-type: none"> 1. Follow protocol for site inspection. 2. Implement regulatory mechanism.
6	Enforcement Procedures	Procedures for enforcement of violations.	Storm Water Task Force will assist with development of enforcement procedures as part of the regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.

**Minimum Control Measure #5:
Post-Construction Storm Water Runoff Control**

Lawrence County proposes to address the Post-Construction Runoff Control measure by implementing both structural and non-structural BMPs through the development of a sound storm water, erosion and sediment control regulatory mechanism. This regulatory mechanism will not only address post-construction storm water management but will also ensure adequate long-term operation and maintenance of the controls that have been installed.

As stated in the construction site runoff control measure, a storm water, erosion and sediment control regulatory mechanism will be developed by the Storm Water Task Force. Through this regulatory mechanism, the committee will review and adopt rules that will encourage the use of structural and non-structural BMPs that address issues related to post-construction pollution.

When developing the storm water, erosion and sediment control regulatory mechanism, the Storm Water Task Force will consider the use of storm water detention and retention ponds in the urbanized areas. Also, vegetative practices such as grass swales and filter strips that have proven environmental benefits will also be considered for requirements under the storm water, erosion and sediment control regulatory mechanism. These practices will be specifically designed to improve water quality and to help maintain pre-development runoff conditions.

To ensure adequate and long-term maintenance of BMPs, the Storm Water Task Force will evaluate the most effective method to review installed BMPs. Sites should be inspected on an annual basis by either an individual agency or a designee within each of the Phase II communities. The Storm Water Task Force will be responsible for developing an inspection and documentation process to ensure adequate and long-term maintenance of BMPs.

Any regulatory mechanisms adopted by the permitting authority will be done so in the realm of their legal capacity to enforce said mechanism. The Lawrence County Commissioners are ultimately responsible for adopting a regulatory mechanism. The Lawrence Soil and Water Conservation District is responsible for the overall management and implementation of this measure.

Measurable Goals for Minimum Control Measure #5

BMP Number	BMP	BMP Description	Year 1 goals	Year 2 goals	Year 3 goals	Year 4 goals	Year 5 goals
1	Ordinance or other regulatory mechanism	The mechanism used to require long-term erosion and sediment controls at construction sites that have reached completion.	Establish a Storm Water Task Force to assist with development of a regulatory mechanism.	Adopt and implement a regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.
2	Post-Construction Requirements	The structural and non-structural BMPs that will be included as part of the program.	Establish a Storm Water Task Force to assist with the development of a regulatory mechanism.	Adopt and implement regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.
3	Site Plan Review Procedures	Procedures for post-construction storm water pollution prevention measures which incorporate consideration of minimizing water quality impacts and attempt to maintain pre-development conditions.	Establish a Storm Water Task Force to assist with the development of a regulatory mechanism that will include a provision for this.	1. Adopt and implement procedures. 2. Review 100% of plans submitted.	1. Implement procedures. 2. Review 100% of plans submitted.	1. Implement procedures. 2. Review 100% of plans submitted.	1. Implement procedures. 2. Review 100% of plans submitted.

4	Site Inspection Procedures	Procedures for inspection of sites with required permits.	The Storm Water Task Force will assist with the development of site inspection procedures as part of the regulatory mechanism.	Implement the regulatory mechanism. Inspection of sites.			
5	Enforcement Procedures	Procedures for enforcement of violations to the program.	The Storm Water Task Force will assist with development of enforcement procedures as part of the regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.
6	Long-Term O&M Plans/Agreements	Operation and Maintenance Agreements between the MS4 and other parties that clearly identifies the responsibilities for maintenance of selected post-construction BMPs.	The Storm Water Task Force will assist with the development of a regulatory mechanism that incorporates a provision for this.	Implement regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.	Implement regulatory mechanism.

Minimum Control Measure #6: Pollution Prevention / Good Housekeeping for Municipal Operations

Lawrence County plans to develop an operation and maintenance program with the ultimate goal of reducing the amount of pollutant runoff from municipal operations. This O&M program will include a training component that educates the employees on the impact of storm water runoff from pipes leading to ditches, spills from vehicles, debris on the roadways, waste disposal and maintenance of facilities and equipment. This training will be provided to Township Trustees and their employees using materials that have been created by the EPA or other credible organizations.

This program will be coordinated with the Public Education and Outreach measure in that some of the materials covered can be presented in a workshop atmosphere where the public can attend as an opportunity to learn about the importance of maintenance. The program will also be coordinated with the Illicit Discharge Detection and Elimination measure in that employees will be responsible for reporting illicit discharges to the appropriate agency. The discharge can then be mapped and monitored.

Under the post-construction runoff control measure, an inspection and follow-up program will be implemented. This program will review structural and non-structural BMPs on an annual basis. This inspection process will help determine what needs to be included in the operation and maintenance program.

Annual inspections of the maintenance facilities by the inspector, as determined in the construction site storm water runoff measure, will help in the development of the operation and maintenance program. The Storm Water Task Force will be responsible for developing an operation and maintenance program that will address problems that will also include pollutants from roads and parking lots.

In Lawrence County flood management is one of the main areas of concern having over \$2,000,000 in damages reported in 1997. Because of the counties topography being primarily steep sloping hillsides that are very erosive, much of the new development is forced into the narrow flood plain valleys. At the present, no studies have been completed in Lawrence County on the impact that flood plain development has on water quality. As part of this measure, the Storm Water Task Force will review the impact flood plain development has on water quality. This task force will look at new projects that are located within flood prone areas and assess the impact these projects have on local streams. The task force will review possible alternatives to reduce the impact a flood prone developed area has on the stream. Some of the possible alternatives include levee setbacks and reduced flood plain fill. The County has flood plain regulations in place that will be used in the consideration of this program.

The overall implementation of this program will be done by the Lawrence Soil and Water Conservation District. Any formal passage of regulatory mechanisms will be done by the permitting authority.

To evaluate the success of this measure, annual inspections of the maintenance facilities will note the use of BMPs outlined in the Operation and Maintenance Plan. The best way to evaluate the success of this measure would be to use water quality assessments. Due to the budget situation in the MS4, this is not a possibility.

Measurable goals for Minimum Control Measure #6

BMP Number	BMP	BMP Description	Year 1 goals	Year 2 goals	Year 3 goals	Year 4 goals	Year 5 goals
1	Employee Training Program	This program will utilize existing materials to train employees about reducing and preventing storm water runoff from activities.	Provide training to township on good housekeeping techniques.	Provide training to township on good housekeeping techniques.	Provide training to township on good housekeeping techniques.	Provide training to township on good housekeeping techniques.	Provide training to township on good housekeeping techniques.
2	MS4 Maintenance	The Operation and Maintenance Plan for the MS4 will address pollutant runoff from municipal operations. It will include maintenance schedules and activities.	The Storm Water Task Force will assist with the development of an operation and maintenance program for municipal operations.	Implement the O&M Program.	Implement the O&M Program.	Implement the O&M Program.	Implement the O&M Program.
3	Flood Management Projects	Development of 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.	The Storm Water Task Force will collect information about flood management projects to determine the need for assessment.	Review the information collected and develop alternatives to improve water quality.	Find ways to assess the impact to water quality using the resources available.	Find ways to assess the impact to water quality using the resources available.	Find ways to assess the impact to water quality using the resources available.