Rule 13 Permit Evaluation Report Requirements, Recommendations, Recognitions 327 IAC 15-13	
MS4 Name: VANDERBURGH COUNTY	**Date of Evaluation: 3/24/2010**
Permit Number: INR040030	Completed By: Reggie Korthals, MPA MS4 Program Coordinator 317-234-1601 rkorthal@idem.IN.gov
MS4 Operator: **JEFF KORB** **VANDERBURGH COUNTY COMMISSIONER** **1 NW MARTIN LUTHER KING JR. BLVD.** **ROOM 305 CIVIC CENTER COMPLEX** **EVANSVILLE IN 47708** **812-435-5241** **jkorb@vanderburghgis.com**	**MS4 Coordinator or Contact:** **JOHN STOLL, P.E.** **COUNTY ENGINEER** **VANDERBURGH COUNTY** **201 NW FOURTH STREET SUITE 306** **OLD VANDERBURGH COUNTY COURT HOUSE** **EVANSVILLE IN 47708-1358** **812-435-5773** **jstoll@vanderburghgov.org**
Participants: • **John Stoll, County Engineer** • **Patrick Seib, Assistant County Engineer**	• **Dale Castrale, Engineering Technician**

PROGRAM AREA 327 IAC 15-13 MS4 PROGRAM MANAGEMENT						
S	**M**	**U**	**Y/N**	**NA/NE**	**S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable NE = Not Evaluated Y = Yes N = No**	
S			Y		1.	Did the MS4 submit an initial NOI and SWQMP Part A?
S			Y		2.	Did the MS4 submit a renewal NOI and SWQMP Part A?
S			Y		3.	Did the MS4 submit a Part B Baseline Characterization Report with signed certification form?
S			Y		4.	Did the MS4 develop and submit to IDEM a Storm Water Quality Management Plan (SWQMP) Part C with signed certification form?
			N		5.	Did the MS4 complete an up-date to their SWQMP Part B and Part C? ***TO BE INCLUDED WITH 2010 ANNUAL REPORT***
S			Y		6.	Were programmatic indicators identified for each Minimum Control Measure in Part C?
	M		Y		7.	Is progress regularly measured against the goals stated in the SWQMP? ***DOCUMENTION NEEDED***
	M		Y		8	Has the MS4 implemented the BMPs identified in the SWQMP for each MCM? ***NOT ALL WERE IMPLEMENTED***
S			Y		9..	Did the MS4 supply a summary of the current storm water budget, expected or actual funding source, and a projection of the budget for the next permit cycle?
				NA	10.	If Co-permitted, is there an MOU or Inter-local agreement?
				NA	11..	If Co-Permitted, does each party have a copy of the signed agreement?
				NA	12.	If Co-permitted, has the agreement been reviewed and or updated for the second five year permit term?

	M		Y		13.	Does the MS4 document all activities and maintain appropriate records? ***DOCUMENTION AND TRACKING NEEDED***
S			Y		14.	Does the MS4 submit required annual reports to IDEM?
S			Y		15.	Was the MS4 prepared for the permit evaluation and inspection and did they provide materials requested by IDEM?

Observations:

- The Vanderburgh County MS4 consistently submits required permit documentation on time.
- The Vanderburgh County MS4 developed and implemented required storm water management ordinances and submitted the six signed certifications for each minimum control measure.
- The MS4 provided all required program management materials for the permit evaluation and demonstrated a process for documentation of activities.
- The MS4 demonstrated that progress is being made to engage various county department supervisors in the implementation of the storm water program.
- The MS4 provided a MS4 organizational chart that outlines duties and responsibilities for departments and staff.
- The MS4 was well prepared for the permit evaluation and site inspections.
- The Vanderburgh County MS4 demonstrated that program challenges during the first permit period included funding and staffing, coordination of all county departments, documentation of activities and implementation of BMPs at county facilities.
- The MS4 plans to review and up-date their SWQMP Part B and Part C during the second permit period.
- The Vanderburgh County MS4 did not provide documentation of storm water pollution prevention training program for municipal employees.

Recommendations:

- The Vanderburgh County MS4 should develop a plan to implement a storm water pollution prevention training for all municipal employees.
- The MS4 should continue to implement program management practices that allow for consistent and accurate record keeping.
- The MS4 needs to develop a process to regularly measure progress against the goals in the SWQMP.
- The Vanderburgh County MS4 should consider exploring the possibility of co-permitting with other MS4 entities in the area or developing a memorandum of understanding with other MS4s to implement components of the program. This type of partnership would be cost effective and allow for consistency in message packaging throughout the area.

Requirements:

- **The Vanderburgh County MS4 shall review the enclosed reports and respond in writing to IDEM for those items that are marginal and unsatisfactory within thirty (30) days of the receipt of the evaluation with a plan to correct deficiencies. The letter should explain how compliance will be met for each item.**
- **The Vanderburgh County MS4 shall review and update their SWQMP Part B (if needed) and SWQMP Part C and submit updates as attachments to their annual report due to IDEM on or before October 1, 2010**
- **The permittee shall develop a plan to provide storm water training to employees and submit that plan to IDEM on or before July 1, 2010. The MS4s shall also include this plan in the SWQMP Part C up-date.**

Further Action:

- IDEM will continue to monitor program management through assessment of the SWQMP, review of annual reports and periodic inspections.

PROGRAM AREA 327 IAC 15-13-12
SWQMP PUBLIC EDUCATION AND OUTREACH

S	M	U	Y/N	NA/NE		S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable NE = Not Evaluated Y = Yes N = No
S			Y		1.	Was reasonable documentation provided to show that an attempt was made to reach all constituents within the MS4 area?
S			Y		2.	Did the MS4 utilize existing programs and outreach materials?
S			Y		3.	Did the MS4 partnered and/or coordinated with other MS4s in the area or other organizations with in the MS4 area to implement an informational program? ***CITY OF EVANSVILLE, COUNTY SOIL AND WATER CONSERVATION DISTRICT, COUNTY SOILD WASTE DISTRICT, COUNTY SURVEYOR'S OFFICE, COUNTY ENGINEERING DEPARTMENT***
	M		Y		4.	Is the education program reviewed for adequacy and accuracy and is it updated as necessary? ***NO REVIEWS OR UP-DATES COMPLETED***
S			Y		5.	Did the MS4 develop measurable goals for this MCM?
			N		6.	Did the MS4 do an initial storm water quality assessment of constituent knowledge? ***NOT DURING FIRST PERMIT TERM - SURVEY IS CURRENTLY ON THE COUNTY WEBSITE***
			N		7.	Did the MS4 do a follow-up assessment of constituent knowledge and participation in the MS4 area? ***TO BE COMPLETED DURING THE SECOND PERMIT TERM***
S			Y		8.	Did the MS4 target improvement in disposal practices (Recycling)?
S			Y		9.	Did the MS4 target schools and school curriculum for storm water education? ***THROUGH THE SWCD***
			N		10.	Did the MS4 develop materials in a second language?
S			Y		11.	Has the MS4 implemented the BMPs identified in their SWQMP?
S			Y		12.	Has the MS4 kept documentation of all activities conducted under this MCM?
S			Y		13.	Did the MS4 provide copies of all materials produced and used in educational program for the permit evaluation?

Observations:

- The Vanderburgh County MS4 did an excellent job of utilizing other county agencies for program implementation: SWCD for rain barrel, rain garden, smart growth, and school programs; Solid Waste District for recycling; Surveyor's Office for citizens' complaints, public education, and construction ordinance development; and the Engineer's Office for staffing and website development and design.
- The focus of educational efforts was on contractors and developers. The MS4 worked hard to provide educational opportunities to the construction community. The Southern Indiana Builders Association assisted with the distribution of workshop information.
- The MS4 did not complete some of the measurable goals in the SWQMP due to staffing and funding issues.
- The constituent knowledge assessment was not completed. The MS4 is using a survey and currently has it on the county website. The MS4 indicted that the information would be used to update the public education and public involvement programs.

Recommendations:

- The Vanderburgh County MS4 needs to complete the knowledge assessment and utilize the findings in program development.
- The MS4 should evaluate the need to develop materials in a second language.

- The MS4 should develop and track specific target outreach or goal percentages and timetables for public education BMPs. This should include a review of what was not completed during the first permit term.
- The MS4 should review target groups and identify outreach to additional stakeholders.
- The Vanderburgh County MS4 should continue and expand coordinated educational efforts with other MS4s and county agencies.

Requirements:

- **The Vanderburgh County MS4 shall review and update their public education program and submit revisions as part of their Part C updates due to IDEM on or before October 1, 2010.**

Further Action:

- IDEM will continue to monitor the public education and outreach program through assessment of the SWQMP, review of annual reports and periodic inspections.

PROGRAM AREA 327 IAC 15-13-13
SWQMP PUBLIC PARTICIPATION AND INVOLVEMENT

S	M	U	Y/N	NA/NE		S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable NE = Not Evaluated Y = Yes N = No
		U	N		1.	Did the MS4 develop a SWQMP that includes provisions to allow opportunities for citizens to participate in the storm water management program development, implementation, and review? ***NOT INCLUDED FOR THE FIRST PERMIT TERM***
		U	N		2.	Did the MS4 provide documentation that demonstrates sufficient opportunities were allotted to involve constituents?
		U	N		3.	Does the MS4 have a plan to provide for participation during the second permit period?
	M		Y		4.	Did the MS4 submit to IDEM a certification form once the program was developed and implemented? ***FORM SUBMITTED, PROGRAM NOT COMPLETELY IMPLEMENTED***
	M		Y		5.	Does the MS4 comply with applicable public notice requirements? ***NOT DOCUMENTED***
			N		6.	Did the MS4 supply documentation of public events?
		U	N		7.	Does the MS4 provide regular program updates and storm water information to elected officials? ***TO BE DONE DURING CURRENT PERMIT PERIOD***
	M		Y		8.	Did the MS4 develop measurable goals for this MCM? ***DID NOT FOLLOW THROUGH AND DOCUMENT***
			N		9.	Did the MS4 identify specific outreach and reduction goal percentages and identify a timetable and was the timetable met?
			N		10.	Did the SWQMP goals for this MCM address participation in citizen panels, community clean-ups, citizen watch groups, drain marking projects and public meeting notification?

Observations:

- Vanderburgh County did not provide any opportunity for public input or participation in the development, implementation and review of the storm water program.
- The development of county ordinances allowed for some public input.
- The Vanderburgh County MS4 has developed a storm water website that is being reviewed and updated on a regular basis.

- Regular updates to elected officials were not done. No presentations on the overall storm water program were provided during public meetings.
- The MS4 did not provide documentation that identified specific outreach and reduction goal percentages and timetables.
- The MS4 did not provide documentation provisions to allow opportunities for citizens to participate in the storm water management program development, implementation, and review.

Recommendations:

- The Vanderburgh County MS4 should continue to review and update their storm water website.
- The MS4 should develop a plan to regularly inform public officials on the storm water program.
- The MS4 should develop a storm water public presentation program to be used for public meetings.
- The MS4 should review and better define the goals for this MCM and include it in the Part C update.
- The MS4 should develop a plan to more successfully engage the public in the permit implementation and review process.
- The Vanderburgh County MS4 may want to consider including members of the public as part of a review group for the up-date of the SWQMP Part C.
- The MS4 should develop a process to better document public involvement activities and events.

Requirements:

- **The Vanderburgh County MS4 shall review and update their public participation program and submit revisions as part of their Part C updates due to IDEM on or before October 1, 2010.**
- **The MS4 shall include a plan with documentation to provide provisions to allow opportunities for citizens to participate in the storm water management program implementation and review.**
- **The MS4 shall include a plan to identify specific outreach and reduction goal percentages and identify a timetable to meet those goals?**

Further Action:

- IDEM will continue to monitor the public involvement and participation program through assessment of the SWQMP, review of annual reports and periodic inspections.

PROGRAM AREA 327 IAC 15-13-14 SWQMP ILLICIT DISCHARGE DETECTION AND ELIMINATION						
S	**M**	**U**	**Y/N**	**NE**	**S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable NE = Not Evaluated Y = Yes N = No**	
S			Y		1.	Is there an ordinance or other regulatory mechanism in place that prohibits illicit discharges into MS4 conveyances and establishes appropriate enforcement procedures and actions? 327 IAC 15-13-14(c) ***VANDERBURGH COUNTY CODE SECTION 13.06 – PASSED 6/19/2007***
S			Y		2.	Did the MS4 submit to IDEM a certification form once the regulatory mechanism was in place?
S			Y		3.	Has the MS4 completed a storm sewer system map showing the location of all outfalls and MS4 conveyances in the MS4 area under the MS4s control?
S			Y		4.	Has the MS4 provided the names and locations of all waters that receive discharges from those outfalls?

Observations:

- The Vanderburgh County MS4 has completed 100% of the required mapping; mapping is in Arc GIS.
- Maps were provided for review by IDEM.
- The MS4 will continue to update and refine the map.

Requirements:

- **The MS4 should continue with screening/monitoring.**
- **There are no additional permit requirements at this time.**

Further Actions:

- IDEM will continue to monitor the illicit discharge and detection program through assessment of the SWQMP, review of annual reports and periodic inspections.
- The complete audit of MCM #3 for illicit discharge, detection, and elimination will be conducted at a future date.

PROGRAM AREA 327 IAC 15-13-15
SWQMP CONSTRUCTION SITE STORM WATER RUN-OFF CONTROL

S	M	U	Y/N	NE		S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable NE = Not Evaluated Y = Yes N = No
S			Y		1.	Has a signed certification form been submitted to IDEM indicating that an ordinance or other regulatory mechanism is in place that allows the MS4 to prohibit illicit discharges into MS4 conveyances and establishes appropriate enforcement procedures and actions?
S			Y		2.	Does the MS4 submit to IDEM the required monthly construction reports? ***THE MS4 SHALL CONTINUE TO KEEP MONTHLY REPORT RESORS, BUT NO LONGER IS REQUIRED TO SEND COPIES TO IDEM***

The IDEM storm water specialist for Vanderburgh County will conduct an independent audit of the construction run-off MCM.

PROGRAM AREA 327 IAC 15-13-16
SWQMP POST CONSTRUCTION STORM WATER RUN-OFF CONTROL

S	M	U	Y/N	NE		S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable NE = Not Evaluated Y = Yes N = No
S			Y		1.	Has a signed certification form been submitted to IDEM indicating that an ordinance or other regulatory mechanism is in place and a program has been implanted to control post construction storm water run-off?

The complete audit of MCM #5 for Post Construction Storm Water Run-off Control will be conducted at another time.

PROGRAM AREA 327 IAC 15-13-17
SWQMP MUNICIPAL OPERATIONS POLLUTION PREVENTION AND GOOD HOUSEKEEPING

S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable NE = Not Evaluated Y = Yes N = No

S	M	U	Y/N	NE		
S			Y		1.	Did the MS4 develop and implement a program to prevent or reduce pollutant run-off from municipal operations? Is the plan included in the SWQMP? (Facility SWPPP)
S			Y		2.	Did the MS4 submit to IDEM a certification form once the program was developed and implemented?
		U	N		3.	Does the MS4 keep written documentation of maintenance activities, schedules, and long term inspection procedures? ***NOT AT THE TIME OF THE AUDIT***
		U	N		4.	Did the MS4 develop controls for reducing or eliminating the discharge of pollutants from operational areas, fueling areas, roads, parking lots, and maintenance and storage yards? ***NOT AT THE TIME OF THE AUDIT***
		U	N		5.	Did the MS4 develop written procedures for the proper disposal of waste or materials removed from separate storm sewer systems and operational areas? ***NOT AT THE TIME OF THE AUDIT***
				NA	6.	Did the MS4 provide written documentation that flood management projects are assessed for their impacts on water quality?
		U	N		7.	Did the MS4 provide written documentation that MS4 entity employees received storm water pollution prevention training? ***NOT AT THE TIME OF THE AUDIT***
		U	N		8.	Did the MS4 develop measurable goals for this MCM? Were specific reduction percentages and timetables identified? ***NOT AT THE TIME OF THE AUDIT***

Observations:

- The Vanderburgh County MS4 completed a storm water pollution prevention plan (SWPPP) for county facilities based on individual site needs and standard BMPs.
- The MS4 provided facility maps and copies of the SWPPP.
- The MS4 conducted a facility assessment to identify concerns utilizing a standard check list. The self inspection included the facility supervisors and employees. Assessments resulted documentation of concerns and recommended corrective action.
- The MS4 demonstrated plans to (1) utilize the litter pick-up program to pick-up roadside trash, (2) coordinate with the City of Evansville to extend street sweeping through major county thoroughfares in the county, (3) begin a new program to clean catch basins and inlets and track program, (4) begin a storm sewer cleaning program, (5) evaluate winter deicing application procedures, and (6) inform and enforce minimization of herbicide applications to county owned property.
- The MS4 did not have an employee storm water pollution prevention training program in place at the time of the audit.
- Vanderburgh County and the City of Evansville have joint jurisdiction over a municipal marina.

Recommendations:

- The Vanderburgh County MS4 should proceed with the implementation and documentation of the identified measurable goals for municipal good housekeeping.
- The MS4 should work with the City of Evansville to determine if a Rule 6 permit is required based on the facility SIC code and contact Megan Nagel (317-234-5029 or mangle@idem.in.gov) to submit the NOI.
- The MS4 should continue to engage and involve department heads in the process.
- The MS4 should develop a plan to provide storm water education to full time and seasonal employees.

Municipal Facility Site Inspections:

- The following municipal facility site inspections were conducted: County Highway Department, Sheriff's Training Center, and Burdette Park – Recreational Center.
- The MS4 conducted self-inspections prior to the audit to determine facility issues and concerns. The inspections included the identification of potential pollutants at each facility.
- The SWPPP was recently completed and full implementation was not done at the time of the audit.
- Individual site inspection reports are included with this report.

Requirements:

- **The Vanderburgh County MS4 shall develop a plan to provide storm water pollution prevention training to all municipal full-time and seasonal employees. The MS4 shall provide documentation to IDEM that the program is in place on or before June 1, 2010.**
- **The MS4 shall develop a plan to measure success of identified goals,**
- **The MS4 shall develop a plan to keep accurate documentation of maintenance activities designed to control and eliminate the discharge of pollutants from operational areas, fueling areas, parking lots, and maintenance and storage yards.**
- **The Vanderburgh County MS4 shall continue to demonstrate a commitment to implement their SWPPP to prevent or reduce pollution run-off from municipal operations.**
- **The MS4 shall include their SWPPP in the update to their SWQMP Part C due to IDEM on or before October 1, 2010.**

Further Actions:

- IDEM will continue to monitor the municipal good housekeeping program through assessment of the SWQMP, review of annual reports and periodic inspections.