

Stormwater Management Program Plan

**National Pollutant Discharge Elimination System
Western Washington Phase II Municipal Stormwater Permit**



**COWLITZ COUNTY DEPARTMENT
OF PUBLIC WORKS**

1600 13th Ave South
Kelso, WA 98626

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Figure 1. Cowlitz County’s Unincorporated Urbanized Area

1.0 INTRODUCTION

1.1 Background and Purpose

Cowlitz County operates a Municipal Separate Storm Sewer System (MS4) to manage stormwater discharges in the Unincorporated Urban Area (UUA) adjacent to the cities of Longview and Kelso, Washington (**Figure 1**). Cowlitz County and its MS4 elements in the UUA are regulated under the federal National Pollutant Discharge Elimination System (NPDES) permit program through the Washington Department of Ecology's (Ecology's) Western Washington Phase II Municipal Stormwater Permit. The current 5-year permit was issued on July 1, 2019 with an effective date of August 1, 2019; it expires on July 31, 2024. Cowlitz County implements a Stormwater Management Program (SWMP) to reduce the discharge of pollutants from the MS4 and protect water quality, as required by the Phase II NPDES Permit. This SWMP Plan serves as written documentation of the County's SWMP in accordance with Condition S5.A.2 of the Permit.

The purpose of this SWMP Plan is to (1) provide the public with a description of the County's SWMP and information about the County's current and planned stormwater management activities; and (2) provide Cowlitz County staff a central reference document for SWMP information and a tool for Permit compliance tracking. It is intended to be updated annually to reflect progress with and changes to the County's SWMP procedures and activities.

1.2 Document Content and Organization

The SWMP Plan is organized according to the major SWMP components required by Condition S5.C of the Permit, which include:

- Stormwater Planning
- Public Education and Outreach
- Public Participation
- MS4 Mapping and Documentation
- Illicit Discharge Detection and Elimination
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Municipal Operations and Maintenance
- Source Control Program for Existing Development

This Plan also addresses the County's SWMP-related Monitoring, Recordkeeping, and Training programs.

The main text of this document presents summary information for each major SWMP element, describing in general terms the related permit requirements, the County's completed and current SWMP activities, and activities the County plans to complete during the current Permit term (2019-2024).

1.3 Additional SWMP References

The County's procedures for implementing the SWMP are contained in a number of manuals that have been developed by the Department of Public Works. These manuals are referenced throughout this SWMP Plan and include the following:

- Illicit Discharge Detection and Elimination Program Manual
- Inspection and Enforcement Manual for Stormwater and Conveyance Facilities Regulated by Cowlitz County's Stormwater Drainage Ordinance
- Stormwater Operations and Maintenance Program Manual
- SWMP Recordkeeping Procedures Manual
- SWMP Training Program Reference Manual

2.0 STORMWATER MANGEMENT PROGRAM (SWMP) COMPONENTS (S5.C)

The Phase II NPDES Permit requires that Cowlitz County's SWMP include eight major components, which are identified and addressed in the following subsections (2.1 through 2.8). This section of the document (1) summarizes the permit requirements for each major program component, (2) discusses the major actions the County has taken or is currently taking to comply with the permit conditions for each program component, and (3) describes the actions the County is planning to take during the course of the current Permit term (2019-2024) to comply with the permit conditions.

2.1 Stormwater Planning (S5.C.1)

2.1.1 Permit Requirements Summary

Each Permittee shall implement a Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. The minimum performance measures are:

- Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.
- Coordination with long-range plan updates
- Stormwater Management Action Planning (SMAP)
- Low impact development code-related requirements

2.1.2 Current Activities

- Assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes were updated in accordance with the 2013 Permit, and the measures developed to address the barriers.
- Continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.

2.1.3 Planned Activities

- Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.
- Coordination with long-range plan updates
- Stormwater Management Action Planning (SMAP)
 - Develop Receiving Water Assessment as a joint venture with other local MS4 permittees

2.2 Public Education and Outreach (S5.C.2)

2.2.1 Permit Requirements Summary

The Permit requires that Cowlitz County's SWMP include an education and outreach program designed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts and encourage the public to participate in stewardship activities. The education program may be developed and implemented locally or regionally.

The Permit establishes minimum performance measures for the education and outreach program on the following topics:

- Building General Awareness
 - General Public and Businesses
 - Engineers, Contractors, Developers, and Land Use Planners
- Effecting Behavior Change
 - General Public and Businesses
 - Residents, Landscapers, Property Managers/Owners
- Stewardship Opportunities/Partnerships
- Measuring Target Audience Understanding

2.2.2 Current Activities

In 2020, Cowlitz County continued working with other NPDES MS4 primary and secondary permittees (The City of Kelso, The City of Longview, Consolidated Diking Improvement District #1, Kelso School District, Longview School District, Lower Columbia College and WSU Cowlitz County Extension) within the Longview/Kelso area on a regional public information and education campaign under the brand "Cowlitz Clean Waters" to implement a public education and outreach program that helps us brand stormwater in Cowlitz County and reach the local population. Unfortunately, due to the Coronavirus and state stay at home mandates, we were unable to do some of our normal activities.

- Cowlitz Clean Water Activities
 - Calendar Art and Haiku Contest for Middle School students -2020 Award Ceremony
 - Cowlitz Clean Water Partners organized a calendar contest that accepted submittals from middle school students of drawings depicting stormwater messages such as picking up dog poop, maintaining your car to prevent oil drips,

etc.. The contest also accepted haiku poems about the same topics from middle school students. 12 drawing and 12 haikus were chosen and constructed into a calendar that was distributed throughout the jurisdictions, school and public to help educate and raise awareness for stormwater.

- Developing and maintaining a web site
 - <http://CowlitzCleanWaters.org>
- KPTV Fox 12 Advertising Campaign
 - Joined with Clark County and Portland Metro area
- Working on updating the general stormwater brochure
- Displayed framed stormwater calendar winners for 2018, 2019 in hallway and 2020 winners in lobby.
- Maintaining a web site
 - The SWMP, annual reports, stormwater regulations and other documents are available on Cowlitz County’s primary website, <https://www.co.cowlitz.wa.us> found on the Stormwater page under Your Departments / Public Works Department/Department Information/ Stormwater Division.
- We also are continuously working with our local property owners (inside and outside the urbanized area) to help educate them on proper erosion control and development techniques. Through phone calls and site visits, we are able to help our residents accomplish their objectives while maintaining adequate stormwater protection. We have found that helping them understand the reasons behind stormwater protection and that small changes to their plans can make a big difference in stormwater protection, it doesn’t have to be big ponds or projects, has been well received.

2.2.3 Planned Activities

The County will be working as part of the *Clean Water Partners* to develop and implement public education and outreach activities throughout the current Permit term (2019-2024). These efforts will focus on communicating how each individual, student, or business can “be a part of the solution to water pollution” and emphasize the importance of keeping waters “fishable and swimmable.” Education and outreach products will be consistent with the *Clean Water Partners’* central message, which is “Only Rain Down the Drain.”

The County and Clean Water Partners will develop a schedule and budget for program activities in 2021. Activities currently planned as part of the education and outreach program include the following (Some of these activities will be dependent on Washington State’s “Healthy Washington – Roadmap to recovery” reopening guideline);

Cowlitz Clean Waters Partners Activities:

Developing stewardship opportunities that involve removal of noxious weeds and planting native vegetation to reduce soil erosion and create buffer zones around streams.

- Encouraging homeowners to use native plants and avoid/limit pesticide applications.

- Encouraging nurseries to promote native plant use.
- Presentations to local clubs and organizations (e.g., Kiwanis Club, Lower Columbia Contractors Association)
- Calendar contest that accepted submittals from middle school students of drawings depicting stormwater messages such as picking up dog poop, maintaining your car to prevent oil drips, etc. The contest also accepted haiku poems about the same topics from middle school students. 12 drawing and 12 haikus were chosen and constructed into a calendar that was distributed throughout the jurisdictions, school and public to help educate and raise awareness for stormwater.
- Video Contest that accepted submittals from high school students to create a public service announcement to help promote ways to clean local waters.
- Developing and maintaining a web site <http://CowlitzCleanWaters.org>
- KPTV Fox 12 Advertising Campaign -joined with Clark County and Portland Metro area
- Outdoor advertising such as billboards and bus wraps
- Setting up informational booths at community events and distributing educational materials at public events such as Cowlitz County Earth Day Festival
- Updating the existing general stormwater brochure “The solution to Stormwater Pollution”

Cowlitz County Activities:

- Received promotional items to pass out to kids at local function to educate kids about stormwater.
 - Emoji Poos stress balls that says “scoop the poop” and
 - Rain drop stress balls that say “only rain down the drain”
- Use parcel addresses from ArcGIS, to mail new flyer to people in UUA.
- Displayed framed stormwater calendar winners for 2019-2024 in hallway and current year winners in lobby.
- Kalama School and Woodland HS Career Fairs pass out educational Stormwater Magnets, Calendar flyers and new promotional items.
- Maintaining a web site
 - The SWMP, annual reports, stormwater regulations and other documents are available on Cowlitz County’s primary website, <https://www.co.cowlitz.wa.us> found on the Stormwater page under Your Departments / Public Works Department/Department Information/ Stormwater Division.
- We will continue to work with our local property owners (inside and outside the urbanized area) to help educate them on proper erosion control and development techniques.

2.3 Public Involvement and Participation (S5.C.3)

2.3.1 Permit Requirements Summary

The Permit requires that Cowlitz County provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities. The County is required to comply with applicable state and local public notice requirements when developing elements of the SWMP.

The Permit establishes minimum performance measures for Public Involvement and Participation, which require the County to:

- Create opportunities for the public to participate in decision-making processes involving the development, implementation, and updating of the County's SWMP, and
- Post the SWMP Plan and annual reports to the County's web site.

2.3.2 Current Activities

The County has established a Stormwater Advisory Committee (SAC) that meets regularly to discuss SWMP-related issues. Applications to serve on the SAC are open to members of the public, providing the opportunity for direct participation in SWMP decision-making processes. The County also holds Public Hearings prior to the adoption of any new stormwater-related code or regulation, providing further opportunity for public involvement.

The County maintains a web site with information related to its SWMP, including the written SWMP Plan and annual reports. The web site also provides contact information for the County's Stormwater Coordinator, providing the public with the opportunity to request additional SWMP information, ask questions, and provide comments.

2.3.3 Planned Activities

The County will continue to hold regular SAC meetings as well as post this SWMP Plan to its web site, along with annual reports and SWMP Plan updates. The web site will also continue to provide contact information for Department of Public Works staff who can field public questions, comments, and requests for additional information.

2.4 MS4 Mapping and Documentation (S5.C.4)

2.4.1 Permit Requirements Summary

The permit requires ongoing mapping and documenting of MS4. The minimum performance measures are:

- *Ongoing Mapping:*
 - Known MS4 outfalls and discharge points.
 - Receiving waters, other than groundwater.
 - Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.
 - Geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters.
 - Tributary conveyances to all known outfalls and discharge points with a 24 inch nominal diameter or larger
 - Connections between the MS4 owned or operated by the Permittee and other municipalities or public entities.
 - All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
- *New Mapping:* (electronic format)
 - Collect size and material for all known MS4 outfalls

- Complete mapping of all known connections from the MS4 to a privately owned stormwater system.

2.4.2 Current Activities

- We have identified and inspected the majority of the MS4 outfalls using the ARCGIS 123 form we created last year. We are now fine tuning the data and updating our map to reflect this new info.

Maintaining a map of the MS4 for the County's Permit coverage area.

2.4.3 Planned Activities

- Continuing to Map all MS4 outfalls.
- Continuing to refine our data
- Maintaining a map of the MS4 for the County's Permit coverage area.
- Creating an ARCGIS Survey form to document private facility inspection.

2.5 Illicit Discharge Detection and Elimination (S5.C.5)

2.5.1 Permit Requirements Summary

The Permit requires that Cowlitz County's SWMP include an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the MS4. The Permit establishes minimum performance measures requiring that the County:

- The program shall include procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified.
- Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- Implement an ordinance or other regulatory mechanism to prohibit non-stormwater, illicit discharges into County's MS4.
- Implement a program to detect and identify non-stormwater illicit discharges to and connections with County's MS4.
- Implement a program to address illicit discharges, including spills and illicit connections, into the County's MS4.
- Train staff who are responsible for identifying and addressing illicit discharges
- Track and maintain records of activities conducted to meet the above requirements.

2.5.2 Current Activities

Cowlitz County currently implements an Illicit Discharge Detection and Elimination (IDDE) Program that was initially developed during the 2007-2012 Permit term. The County's IDDE Program is administered by the Department of Public Works. IDDE Program activities completed to date include:

- Development, implementation, and documentation of County procedures to detect, identify, and respond to illicit discharges. This includes:
 - Maintaining a public reporting system for illicit discharge reports
 - Documenting reports of illicit discharges received from the public, other departments, and outside agencies
 - Performing outfall inspections
 - Tracing the source of identified illicit discharges through Storm Drain Network Investigations or other means
 - Providing technical assistance to parties responsible for identified illicit discharges and working to promote voluntary compliance with IDDE regulations
 - Implementing corrective action and enforcement procedures until an identified illicit discharge is adequately addressed
 - We created an ARCGIS Survey 123 form to make it easier to track illicit discharge complaints.
- Holding training sessions for County staff (managers and field personnel) with responsibilities for IDDE Program implementation

2.5.3 Planned Activities

The County plans to continue implementing its IDDE Program activities for the duration of the 2019-2024 Permit term. Major changes to the program are not anticipated at this time. Planned activities include:

- Providing refresher training to County staff with IDDE Program responsibilities
- Performing outfall inspections on newly identified outfalls smaller than 24"
- Update Illicit Discharge Detection and Elimination Program Manual
- Test new ARCGIS Survey 123 form for IDDE in field and update as necessary.

2.6 Controlling Runoff from New Development, Redevelopment and Construction Sites (S5.C.6)

2.6.1 Permit Requirements Summary

Cowlitz County is required by the Permit to implement and enforce a program to reduce pollutants in stormwater runoff to its MS4 from new development, redevelopment, and construction site activities. The program must apply to private and public development, including roads.

The Permit establishes minimum performance measures requiring that the County:

- Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects

- Implement a permitting process for development/construction activities that includes site plan review and site inspection and enforcement capabilities
- Provide copies of Ecology's Notice of Intent (NOI) forms to prospective applicants of development/construction projects
- Provide training to County staff with job responsibilities for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites.
- Review and revise existing development codes, rules, and standards to incorporate and require Low Impact Development (LID) principles and BMPs.

2.6.2 Current Activities

Cowlitz County currently implements a program to control stormwater discharges from construction and development sites that was developed during the current Permit term. Program activities completed to date include:

- Publishing a Stormwater Drainage Manual (2017) that identifies minimum stormwater management requirements and standards for development activities, in accordance with CCC 16.22 and consistent with the 2014 Stormwater Management Manual for Western Washington (SWMMWW)
- Inspecting permitted sites and stormwater facilities before, during, and after construction
- Maintaining records of construction site and stormwater facility inspections, corrective actions, and enforcement procedures

The County has documented procedures related to this program element in its ***Inspection and Enforcement Manual for Stormwater and Conveyance Facilities Regulated by Cowlitz County's Stormwater Drainage Ordinance***. The Inspection and Enforcement Manual provides an overview of how stormwater from development and construction sites is regulated under CCC 16.22 and addresses inspection and enforcement procedures for stormwater and conveyance facilities. It serves as a reference to County staff responsible for completing inspections and enforcement actions under the Stormwater Drainage Ordinance.

2.6.3 Planned Activities

The County will continue to implement current runoff controls developed in accordance with the current Permit. The County also plans to update the Inspection and Enforcement Manual for Stormwater and Conveyance Facilities Regulate by Cowlitz County's Stormwater Drainage Ordinance.

2.7 Municipal Operations and Maintenance (S5.C.7)

2.7.1 Permit Requirements Summary

Cowlitz County is required by the Permit to implement an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. The Permit establishes minimum performance standards for this program element that require the County to:

- Implement a program to verify adequate long-term operation and maintenance of stormwater treatment and flow control facilities for permitted projects
- Implement maintenance standards protective of stormwater facility function
- Annually inspect all County-owned or operated permanent stormwater treatment and flow control facilities, and take appropriate maintenance actions in accordance with adopted maintenance standards.
- Perform spot checks of potentially damaged permanent stormwater treatment and flow control facilities after major storm events, and respond with appropriate repairs/maintenance in accordance with adopted maintenance standards
- Inspect all County-owned or operated catch basins at least once every two years, and cleaning the catch basins if needed to comply with adopted maintenance standards.
- Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from lands owned or maintained by the County, and road maintenance activities under the control of the County
- Implement a training program for County employees whose primary construction, operations, or maintenance job functions may impact stormwater quality
- Implement a Stormwater Pollution Prevention Plan (SWPPP) for heavy equipment maintenance or storage yards and material storage facilities
- Maintain records of inspection and maintenance/repair activities conducted by the County

2.7.2 Current Activities

Cowlitz County currently implements an Operations and Maintenance Program with the goal of preventing or reducing pollutant runoff from municipal operations. O&M Program activities completed to date include:

- Maintaining maintenance standards for stormwater and conveyance facilities that are consistent with those contained in Ecology's 2005 SWMMWW
- Performing inspections of catch basins and County-maintained stormwater facilities. .
- Cleaning catch basins and maintaining stormwater facilities in accordance with the adopted maintenance standards
- We created an ARCGIS Survey form to document catch basin inspections and cleaning.
- We are updating our mapping data to include unique ID#'s for each catch basin, so they are easier to identify in the field and on the new form.
- Continual implementation of the SWPPP for the County's equipment maintenance and storage facilities
- Maintaining training for County employees with responsibilities for municipal O&M program activities

2.7.3 Planned Activities

The County will continue to implement its Stormwater O&M Program activities for the duration of the 2019-2024 Permit term. Major changes to the program are not anticipated at this time. Planned activities include:

- Continuing to implement inspection and maintenance activities and maintaining records for these activities.
- Test our new ARCGIS Survey 123 form for catch basin inspection and cleaning in the field and update form and data as necessary.
- Reconcile our two lists of catch basins. We have the list that the road crew currently uses to do its inspections and cleaning. We also have a list from ARCGIS of all the catch basins we mapped. We realized we mapped some private catch basins and some catch basins that are outside of the permit area. We are working on identifying these and updating our maps.
- Providing training to County staff with Stormwater O&M Program responsibilities
- Updating the [Stormwater Operations and Maintenance Program Manual](#)

2.8 Source Control Program for Existing Development (S5.C.8)

2.8.1 Permit Requirements Summary

The Permittee shall implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. Minimum performance measures:

- Adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities
- Establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4
- Implement an inspection program for sites identified above
- Implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period
- Train staff who are responsible for implementing the source control program to conduct these activities.

2.8.2 Current Activities

- Creating an inventory of institutional, commercial, and industrial sites by a combination of review of zoning in ARCGIS and site visits.

2.8.3 Planned Activities

- Adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities
- Continue to work on an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4

- Implement an inspection program for sites identified above

3.0 MONITORING (S8)

3.1 Permit Requirements Summary

Section S8 of the NPDES Permit details Permittee requirements for *Monitoring and Assessment*. Cowlitz County has responsibilities under this section of the Permit related to (S8.A) *Regional Status and Trends Monitoring and* (S8.B) *Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies*.

- (S8.A) *Regional Status and Trends Monitoring*
 - For the previous permit (2013-2018) the County's choice for S8.B Status and Trends Monitoring was Option #1 and is required to make a one-time payment into the collective fund to implement regional small streams and marine nearshore areas status and trends monitoring in Puget Sound.
 - For the current permit (2019-2024) select one of two options for meeting effectiveness study obligations.
 - Option #1 involves making annual payments into a collective fund to implement regional receiving water status and trends monitoring of urban streams in Clark and Cowlitz Counties in the Lower Columbia River basin.
 - Option #2 involves conducting stormwater discharge monitoring.
 - Notify Ecology of the selected option by December 1, 2019.
- (S8.B) *Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies*
 - For the previous permit (2013-2018) the County's choice for S8.C Effectiveness Studies was Option #1 and is required to make a one-time payment into the collective fund to implement effectiveness studies and source identification studies.
 - For the current permit (2019-2024), select one of two options to satisfy its Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies requirements,
 - Option #1 involves the County to make annual payments into a collective fund to implement effectiveness and source identification studies.
 - Option #2 involves conducting stormwater discharge monitoring.
 - Notify Ecology of the selected option by December 1, 2019

3.2 Current Activities

Cowlitz County has notified Ecology of its intent to satisfy (S8.A) *Regional Status and Trends Monitoring* requirements through Option #1 which involves making annual payments into a collective fund to implement regional receiving water status and trends monitoring of urban streams in Clark and Cowlitz Counties in the Lower Columbia River basin.

Cowlitz County has notified Ecology of its intent to satisfy *Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies* requirements through Option #1 which involves the County to make annual payments into a collective fund to implement effectiveness and source identification studies.

3.3 Planned Activities

The County will continue to make annual (S8.A) *Regional Status and Trends Monitoring* fund payments to Ecology. The annual payments will be in the amount of \$3,189, as required by the payment table in Appendix 11 of the Permit. The County will also continue to make annual payments in the amount of \$3,948, as required by the payment table in Appendix 11 of the Permit, to Ecology's collective fund *Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies*.

In addition to the permit-required monitoring fund payments described above, the County has continued to participate in SW Region status and trends monitoring activities, in coordination with Ecology and other local agencies in SW Washington.

4.0 RECORDKEEPING (S5.A.3)

4.1 Permit Requirements Summary

Cowlitz County's SWMP is required by Section S5.A.3 of the 2019-2020 Permit to "include an ongoing program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation and permit compliance and to set priorities." The County is required by Section S9 of the Permit (Reporting Requirements) to keep all records related to the Permit and the SWMP for at least five (5) years and make these records available to the public upon request.

There are additional SWMP recordkeeping requirements in the Permit that require the County to track activities associated with individual program components, including inspections, enforcement actions, training, etc.

4.2 Current Activities

The County developed recordkeeping procedures for the major SWMP components during the 2007-2012 Permit term. The Department of Public Works documented these procedures in a ***SWMP Recordkeeping Procedures Manual***, which serves as a reference to County staff responsible for recording and tracking SWMP activities.

The Recordkeeping Procedures Manual describes the County's processes for gathering, recording, and tracking information related to the County's implementation of its SWMP. The Manual is organized according to the five major SWMP components required by the Permit. Each section of the manual summarizes major program activities associated with the respective SWMP component, identifies the relevant recordkeeping requirements, assigns responsibilities, and outlines procedures for meeting these requirements.

The County has developed a number of forms and tracking logs to standardize and help facilitate the SWMP recordkeeping processes. These forms and tracking logs are contained in the appendices of the Manual and include the following:

Recordkeeping Forms

- Stormwater Facility Inspection Form
- Water Quality Incident Report Intake Form
- IDDE Incident Response Form
- Outfall Inspection Form

SWMP Activity Tracking Logs

- Public Education and Outreach Activity Tracking Log
- Public Involvement and Participation Activity Tracking Log
- IDDE Incident Tracking Log
- IDDE Outfall Inspection Log
- IDDE Enforcement Action Tracking Log
- Construction Inspection Log for Stormwater and Conveyance Facilities
- Post-Construction Inspection and Maintenance Log for Privately Maintained Stormwater Facilities
- Stormwater Drainage Ordinance Enforcement Action Tracking Log
- Inspection and Maintenance Log for Publicly Maintained Stormwater Facilities

4.3 Planned Activities

The County plans to continue implementing its recordkeeping procedures for the 2019-2024 Permit term. Procedures will be updated on an as-needed basis in order to comply with conditions of the current Permit and/or to reflect process improvements made by the County. The County will update its ***SWMP Recordkeeping Procedures Manual*** to acknowledge the 2019-2024 Permit and reflect any changes in recordkeeping procedures.

5.0 TRAINING (S5.C.3 – 5)

5.1 Permit Requirements Summary

The County is required by the Permit to provide training to County employees with responsibilities for SWMP implementation. The training requirements include those listed in the conditions below:

Illicit Discharge Detection and Elimination

Permit Condition S5.C.3.c(iii):

Each Permittee shall implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4. The program shall include the following components:

An ongoing training program for all municipal field staff, who, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4, on the identification of an illicit discharge and/or connection, and on the proper procedures for reporting and responding to the illicit discharge and/or connection. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of the trainings provided and the staff trained.

Permit Condition S5.C.3.e:

Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

Controlling Runoff from New Development, Redevelopment, and Construction Sites

Permit Condition S5.C.4.e

Each Permittee shall ensure that all staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

Pollution Prevention and Municipal Operations and Maintenance

Permit Condition S5.C.5.g

Implement an ongoing training program for employees of the Permittee whose primary construction, operations or maintenance job functions may impact stormwater quality. The training program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of training provided and the staff trained.

5.2 Current Activities

The County administers and implements a training program to ensure that staff with SWMP responsibilities are trained to conduct these activities. The Department of Public Works has developed a **SWMP Training Program Reference Manual** to guide County staff responsible for providing training as part of the County's SWMP. This Manual is organized into the following three sections to address specific training requirements contained in the Permit:

- Illicit Discharge Detection and Elimination
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Pollution Prevention and Municipal Operations and Maintenance

Each section of the Manual summarizes the major program activities associated with the respective SWMP component, identifies the relevant training requirements from the Permit, and identifies training topics for specific County departments and staff. The Manual includes training materials to guide the County's training efforts for its SWMP.

5.3 Planned Activities

The County will continue to implement its existing training program and update as necessary to address the requirements of the 2019-2024 Permit. Training efforts during the current Permit term will focus on (1) ensuring staff understand existing processes and responsibilities, and (2) ensuring staff understand changes in processes and responsibilities associated with the 2019-2024 Permit.

The County will update its **SWMP Training Program Reference Manual** to account for program changes. Updates to the County's various procedure manuals will be communicated to employees and incorporated into the training.