

# Storm Water Management Program For Washington County

## Municipal Separate Storm Sewer System (MS4) Permit Wisconsin Pollutant Discharge Elimination System (WPDES)

On October 28, 2014, the Wisconsin Department of Natural Resources (DNR) formally notified Washington County on their determination that the county owns or operates a municipal separate storm sewer system that requires coverage under a WPDES permit. This notice required the county to submit a Notice of Intent which was submitted January 23, 2015. On March 6, 2015 Washington County was issued a WPDES MS4 Permit requiring the county to implement a storm water management program and control measures to improve urban water quality. Thus the March 6, 2015 date is recognized as the start date for the compliance schedule discussed later.

### Background

Urban storm water runoff contains pollutants from roads, parking lots, construction sites, industrial storage yards and lawns. In 1987 Congress amended the federal Clean Water Act to control storm water pollution. Federal regulations thus required owners of storm water pollution sources, including many industries, municipalities and construction sites, to have National Pollutant Discharge Elimination System (NPDES) Stormwater Permits.

At the State level and to meet the requirements of the federal Clean Water Act, DNR developed the Wisconsin Pollutant Discharge Elimination System (WPDES) Storm Water Discharge Permit Program which is administered under the authority of ch. NR 216, Wis. Adm. Code.

A Municipal separate storm sewer system or MS4 means a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, constructed channels or storm drains, which meet the following criteria: 1) Owned or operated by a municipality, 2) Designed or used for collecting or conveying storm water, 3) Is not a combined sewer conveying both sanitary and storm water, and 4) Is not part of a publicly owned wastewater treatment works that provides secondary or more stringent treatment.

A WPDES MS4 permit is required for a municipality that meet one of the following criteria:

1. It is located within a federally-designated Urbanized Area,
2. Its population equals 10,000 or more based on the latest decennial census; or
3. When the Department of Natural Resources designates the municipality for permit coverage in accordance with s. NR 216.025.

The MS4 permits are effective for a period of up to five years, at which point the permits are updated and re-issued.

About 220 municipalities in Wisconsin are currently required to have a WPDES MS4 permit.

## Permit Requirements

The MS4 permit requires the county develop a storm water management program that includes information and education of the public, involvement and participation of the public, illicit discharge detection and elimination, creation and enforcement of local ordinances to regulate erosion control and long-term storm water management, and implementation of pollution prevention at municipally-owned facilities.

The MS4 permit requires implementation of best management practices for source-area control instead of numerical effluent limits. Thus the county is required to implement or prove a reduction in total suspended solids (TSS) in runoff that enters waters of the state as compared to no controls. To control TSS, storm water management control practices such as storm water infiltration basins, wet ponds, bioretention, and other practices may need to be constructed, if current practices are not sufficient to meet the TSS reduction requirement. The initial assessment must include a pollutant-loading analysis using a model approved by the DNR.

## Storm Water Management Program

The following provides information on Washington County's Storm Water Management Program and is intended to be a **living document** on how the county will meet its requirements of Wisconsin Administrative Rule NR 216 and its WPDES MS4 permit. This plan establishes activities and programs, and provides a schedule for implementation that aligns with the compliance and implementation schedule of the MS4 Permit (see table 1).

After reviewing Table 1, one can sense that meeting permit requirements and maintaining compliance is a process. A living document allows for continued compliance, and provides opportunity for changes, amendments and updates as land use and land management activities change, as technology improves, and regulations change. Furthermore, this document provides the ability to identify deficiencies in any program or activity and allows for the opportunity to make modifications throughout the process.

This Storm Water Management Program plan cover serves as the skeleton document and provide placeholders for each respective required activity. Permit requirements, compliance activity and schedules are organized by attachments:

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|----------------|--|
| Attachment "A" | Public Education and Outreach (2.1) – To encourage the public and businesses to modify their behaviors and procedures to reduce storm water pollution. |
| Attachment "B" | Public Involvement and Participation (2.2) – To encourage and allow for participation from individuals to prevent storm water pollution.               |
| Attachment "C" | Illicit Discharge Detection and Elimination (2.3) – Develop a program to identify, prevent, and eliminate illicit discharges to storm sewer systems.   |

- Attachment “D” Construction Site Pollutant Control (2.4) – Adopt/update a soil erosion control ordinance and enforce it on construction sites.
- Attachment “E” Post-Construction Storm Water Management (2.5) – Develop/update a post-construction ordinance and enforce it to ensure that areas of new and redevelopment will include structural measures to control pollutants, control peak flow, maintain infiltration, and establish vegetated protective areas adjacent to waterways and wetlands.
- Attachment “F” Pollution Prevention (2.6) – Implement and maintain practices to prevent pollutants from municipally-owned transportation infrastructure, maintenance areas, storage yards, sand and salt storage areas, and waste transfer stations from entering the storm sewer system.
- Attachment “G” Storm Water Quality Management (2.7) - Reduce the Total Suspended Solids (TSS) carried in storm water from existing urban areas as compared to no controls; achieve the state standard of 20 percent TSS reduction.
- Attachment “H” Storm Sewer System Maps (2.8) – Develop and maintain a map of the storm sewer system; identifying storm sewer conveyances such as pipes and ditches, and also identify roads, streams and lakes.
- Attachment “I” Impaired Waters TMDL Implementation (1.5) – Where the storm sewer system discharges a pollutant of concern to an impaired water, a plan shall be developed to reduce those pollutants.
- Attachment “J” Annual Report (2.9) – An annual report on the status of permit requirements and a fiscal analysis on annual expenditures and proposed budget for program activities.

Table 1

WPDES Permit No. WI-S050181-1

Compliance Schedule

PERMIT SECTION	ACTIVITY	COMPLIANCE DATE	IMPLEMENTATION DATE	COMMENTS
Section 1.5.1	Discharges to an impaired waterbody	Within 90 days of start date and by March 31 of each odd-numbered year thereafter		All permittees
Section 1.5.4.3	Updated storm sewer system map and excluded areas	TMDL approved prior to the effective date of this permit: Within 24 months of the start date of permit coverage  TMDL approved after the effective date of this permit: Within 24 months of the approval date of the TMDL		Applies to a permittee that discharges to an impaired waterbody with an approved TMDL that assigns the permittee a wasteload allocation.
Section 1.5.4.4	Tabular summary	TMDL approved prior to the effective date of this permit: Within 48 months of the start date of permit coverage  TMDL approved after the effective date of this permit: Within 48 months of date of approval of TMDL		Applies to a permittee that discharges to an impaired waterbody with an approved TMDL that assigns the permittee a wasteload allocation.
Section 1.5.4.5	Written plan	TMDL approved prior to the effective date of this permit: Within 48 months of the start date of permit coverage  TMDL approved after the effective date of this permit: Within 48 months of date of approval of TMDL		Applies to a permittee not meeting all its wasteload allocations.
Section 2.1	Public Education and Outreach –Submit public education and outreach program	Within 18 months of start date	Within 24 months of start date	All permittees
Section 2.2	Public Involvement and Participation –Submit public involvement and participation program	Within 18 months of start date	Within 24 months of start date	All permittees
Section 2.3	1. Illicit Discharge Detection and Elimination – Section 2.3.1, submit illicit discharge ordinance	Within 24 months of start date	Within 30 months of start date	All permittees
	2. Illicit Discharge Detection and Elimination – Section 2.3.2, Complete initial field screening		Within 36 months of start date	All permittees

	3. Illicit Discharge Detection and Elimination – Section 2.3.3, submit on-going field screening	Within 36 months of start date	Within 48 months of start date	All permittees
	4. Illicit Discharge Detection and Elimination – Section 2.3.4, submit illicit discharge response procedures	Within 24 months of start date	Within 30 months of start date	All permittees
Section 2.4	1. Construction Site Pollutant Control – Section 2.4.1, submit construction site pollutant control ordinance	Within 18 months of start date	Within 24 months of start date	All permittees
	2. Construction Site Pollutant Control – Section 2.4.2, submit construction site inspection and enforcement procedures	Within 18 months of start date	Within 24 months of start date	All permittees
Section 2.5	1. Post-Construction Storm Water Management –Section 2.5.1, submit post-construction storm water management ordinance	Within 18 months of start date	Within 24 months of start date	All permittees
	2. Post-Construction Storm Water Management –Section 2.5.2, submit long-term maintenance procedures	Within 18 months of start date	Within 24 months of start date	All permittees
Section 2.6	Pollution Prevention – Submit pollution prevention program	Within 24 months of start date	Within 30 months of start date	All permittees
Section 2.7	1. Storm Water Quality Management – Section 2.7.2, submit evaluation of flood control structures	Within 24 months of start date		All permittees
	2. Storm Water Quality Management – Section 2.7.3, submit assessment of compliance	Within 24 months of start date		All permittees
Section 2.8	MS4 Map – Submit MS4 map	Within 24 months of start date		All permittees
Section 2.9	Annual Report – Submit annual report	By March 31 of each year*		All permittees
Section 2.12	Reapplication for Permit Coverage – Submit reapplication	180 days prior to permit expiration date		All permittees

*\* Note: An annual report are not required after the initial calendar year of permit coverage. The first annual report sent to the Department shall report on the previous 2 calendar years of permit coverage.*

## Attachment “A”

### **Washington County Public Education and Outreach (2.1)**

*Goal: To encourage the public and businesses to modify their behaviors and procedures to reduce storm water pollution.*

Compliance Date: September 6, 2016

Implementation Date: March 6, 2017

#### **Program Objectives**

Develop and implement a public education and outreach program to increase the awareness of storm water pollution impacts on waters of the state to encourage changes in public behavior to reduce such impacts. The program shall establish measurable goals and, at a minimum, include the following elements:

- 2.1.1** Promote detection and elimination of illicit discharges and water quality impacts associated with such discharges from municipal separate storm sewer systems.
- 2.1.2** Inform and educate the public about the proper management of materials that may cause storm water pollution from sources including automobiles, pet waste, household hazardous waste and household practices.
- 2.1.3** Promote beneficial onsite reuse of leaves and grass clippings and proper use of lawn and garden fertilizers and pesticides.
- 2.1.4** Promote the management of streambanks and shorelines by riparian landowners to minimize erosion and restore and enhance the ecological value of waterways.
- 2.1.5** Promote infiltration of residential storm water runoff from rooftop downspouts, driveways and sidewalks.
- 2.1.6** Inform and where appropriate educate those responsible for the design, installation, and maintenance of construction site erosion control practices and storm water management facilities on how to design, install and maintain the practices.
- 2.1.7** Identify businesses and activities that may pose a storm water contamination concern, and where appropriate, educate specific audiences on methods of storm water pollution prevention.
- 2.1.8** Promote environmentally sensitive land development designs by developers and designers, including green infrastructure and low impact development.

#### **Work Plan - Public Education and Outreach**

This Public Education and Outreach Work Plan outlines how Washington County will implement a program to meet the objects indicated above. The following table identifies: 1) various educational activities, 2) defines the responsible party providing the activity, 3) lists the targeted audience, 4) provides an implementation timeframe, and 5) identifies measurable goals. Since the county is responsible for only educating people associated with properties owned and operated by the county in the urbanized areas the need for an extensive educational effort is minimal. However for more than 30 years the county has, and continues to provide various information and educational programs directed at a wide audience on various ways to improve water quality. The Planning and Parks Department (PPD) which includes the Land and Water

Conservation Division have been active in the field of erosion control and stormwater management for over three decades. The PPD has continually included water quality prevention and education in nearly all of its public education and outreach activities. The following are existing I & E activities geared at increasing awareness of storm water quality impacts for our citizens:

1. Daily one-on-one conversations with county residents providing information related to soil and water conservation issues.
2. Provide several conservation education presentations and workshops to youth and adult groups. Also, set up conservation displays at public events like: County Fair and Breakfast-on-the-Farm.
3. Publish articles in biannual newsletter which reaches over 4,000 homes.
4. Facilitate storm drain stencil activities throughout the county to create awareness and help prevent illicit discharges.
5. Annual *Native Tree and Prairie Seed Sale* including the sale of rain barrels and compost bins.
6. Host biannual full-service Household and Agricultural Clean Sweep events.
7. Maintain a website covering all soil and water conservation programs typical of most Land and Water Conservation offices across the state: [www.co.washington.wi.us/lcd](http://www.co.washington.wi.us/lcd)
8. Maintain a stormwater education specific webpage which is a remnant of a NR 216 grant the county received in 2002. We continued to maintain ownership of the domain name which directly links to the stormwater education webpage: [www.Cleanways.org](http://www.Cleanways.org).

Washington County staff believe that our current education and outreach efforts already meet the minimum requirements of our MS4 general permit. Additional public education and outreach efforts will focus on targeted audiences identified in the following table. A workgroup of county staff and representatives from local MS4 permitted communities will also be established to help address permit requirements, assist with permit compliance and provide education and outreach program leadership.

## Program Activities

### Public Education and Outreach For Washington County

2.1.1 Promote detection and elimination of illicit discharges and water quality impacts associated with such discharges from municipal separate storm sewer systems.				
Action	Responsible Department	Target Audience	Implementation Timeline	Measurable Goals
Presentation(s) to explain illicit discharges, regulatory requirements, and ordinance language.	PPD	Public Works Committee & County Board Supervisors	Winter 2016/2017	<ul style="list-style-type: none"> <li>- One presentation given to Public Works Committee.</li> <li>- Information provided in Public Works Committee Agenda Packet.</li> </ul> <p><i>Note: County Board passes ordinance in July, 2016.</i></p>
Educational program and training for staff on field screening, identification, sampling, and enforcement.	PPD with assistance from DNR Staff	PPD Staff & Highway Staff	Spring 2017	<ul style="list-style-type: none"> <li>- Develop educational materials and provide class/field training.</li> <li>- One educational/training for existing staff.</li> <li>- One-on-one training annually when needed and for new staff.</li> </ul>
Assist local governments with implementing educational program.	PPD & Highway Dept. with assistance from DNR Staff	Local Government's Public Works Employees	2016-2020	<ul style="list-style-type: none"> <li>- Develop educational materials and provide class/field training.</li> <li>- One educational/training for existing staff.</li> <li>- Number of local governments assisted.</li> </ul>
Distribute educational information.	PPD	General public	Spring 2017	Print one educational article for newspapers and/or newsletter annually.
2.1.2 Inform and educate the public about the proper management of materials that may cause storm water pollution from sources including automobiles, pet waste, household hazardous waste and household practices.				
Action	Responsible Department	Target Audience	Implementation Timeline	Measurable Goals
Provide education material and presentations on sources of storm water pollution.	PPD	County staff, elected officials, businesses & general public	Spring 2017 - 2020	<ul style="list-style-type: none"> <li>- Develop educational materials, and update as needed.</li> <li>- Conduct one educational presentations &amp; print one educational article for newspaper or newsletter annually.</li> </ul>
Maintain Cleanways.org	PPD & Highway	All viewers	Ongoing	Cleanways.org website continues to serve as an

website with related information.	Dept.			effective source for educational information and material.
Continue to maintain and provide storm drain stenciling equipment.	PPD	Local Governments, Civic Groups & Organizations	2017 - 2020	Number of storm drains stenciled annually.
Offer assistance to local governments with implementing educational program.	PPD	Local Governments & General Public	Ongoing	Number of cooperative agreements or number of requests for educational materials.  <i>Note: If needed, a cooperative working agreement will be developed.</i>
<b>2.1.3 Promote beneficial onsite reuse of leaves and grass clippings and proper use of lawn and garden fertilizers and pesticides.</b>				
<b>Action</b>	<b>Responsible Department</b>	<b>Target Audience</b>	<b>Implementation Timeline</b>	<b>Measurable Goals</b>
Provide education material and presentations on sources of storm water pollution related to goal.	PPD	County staff, elected officials, businesses & general public	Spring 2017 -2020	- Develop educational materials, and update as needed. - Conduct one educational presentations & print one educational article for newspaper or newsletter annually.
Maintain Cleanways.org website with related information.	PPD & Highway Dept.	All viewers	Ongoing	Cleanways.org website continues to serve as an effective source for educational information and material.
Continue to provide related products thru annual tree program and website, e.g. rain barrels, compost bins, etc... Make products available throughout the year.	PPD	General public	Ongoing	- Number and type of products sold. - Promote program goal 2x per year through various tools, e.g. website, newsletters, social media, etc...
Educating people about available composting facilities.	PPD	General public	Spring 2018	Develop a list of both public and private organic refuse sites and post on website.
Offer assistance to local governments with implementing educational program.	PPD	Local Governments & General Public	Ongoing	Number of cooperative agreements or number of requests for educational materials.  <i>Note: If needed, a cooperative working agreement will be developed.</i>
<b>2.1.4 Promote the management of streambanks and shorelines by riparian landowners to minimize erosion and restore and enhance the ecological value of waterways.</b>				

<b>Action</b>	<b>Responsible Department</b>	<b>Target Audience</b>	<b>Implementation Timeline</b>	<b>Measurable Goals</b>
Develop educational materials relating to storm water & shoreland zoning ordinance.	PPD	Developers & Riparian land owners	Fall 2017	- Develop educational materials, and update as needed. - Print one educational article for newspaper or newsletter annually.
Hold public forum or tour to explain storm water impacts and benefits of riparian buffers.	PPD	Riparian landowners & developers	2017-2020	One event held annually, this may be combined with other programs due to similar goals.
Offer assistance to local governments with implementing educational program.	PPD	Local Governments & General Public	Ongoing	Number of cooperative agreements or number of requests for educational materials.  <i>Note: If needed, a cooperative working agreement will be developed.</i>
<b>2.1.5 Promote infiltration of residential storm water runoff from rooftop downspouts, driveways and sidewalks.</b>				
<b>Action</b>	<b>Responsible Department</b>	<b>Target Audience</b>	<b>Implementation Timeline</b>	<b>Measurable Goals</b>
Develop educational materials relating to infiltration requirements in storm water ordinance.	PPD	Developers & General public	Fall 2017	- Develop educational materials, and update as needed. - Print one educational article for newspaper or newsletter annually.
Advertise existing sites successfully utilizing rain gardens and rain barrels.	PPD	General public	Spring 2018	Develop and maintain one rain garden educational material. Distribute rain garden educational materials. Hold an open house at one demonstration rain garden site.
Hold public forum or tour to explain storm water impacts and benefits of reducing storm water runoff.	PPD	Developers, Engineers, & Contractors	2017-2020	One event held annually, this may be combined with other programs due to similar goals.
Offer assistance to local governments with implementing educational program.	PPD	Local Governments & General Public	Ongoing	Number of cooperative agreements or number of requests for educational materials.  <i>Note: If needed, a cooperative working agreement will be developed.</i>
<b>2.1.6 Inform and where appropriate educate those responsible for the design, installation, and maintenance of construction site erosion control practices and storm water management facilities on how to design, install and maintain the practices.</b>				

<b>Action</b>	<b>Responsible Department</b>	<b>Target Audience</b>	<b>Implementation Timeline</b>	<b>Measurable Goals</b>
Develop educational materials relating to erosion control and storm water ordinance.	PPD	Developers, Engineers, Contractors & Public Officials	Spring 2017	- Develop educational materials, and update as needed. - Print one educational article for newspaper or newsletter annually.
Hold public forum or tour to explain how unprotected construction sites and the impacts of uncontrolled storm water can have on water quality.	PPD	Developers, Engineers, & Contractors & General Public	2017-2020	One event held annually, this may be combined with other programs due to similar goals.
Offer assistance to local governments with implementing educational program.	PPD	Local Governments & General Public	Ongoing	Number of cooperative agreements or number of requests for educational materials.  <i>Note: If needed, a cooperative working agreement will be developed.</i>
<b>2.1.7 Identify businesses and activities that may pose a storm water contamination concern, and where appropriate, educate specific audiences on methods of storm water pollution prevention.</b>				
<b>Action</b>	<b>Responsible Department</b>	<b>Target Audience</b>	<b>Implementation Timeline</b>	<b>Measurable Goals</b>
Utilizing existing models, inventory and evaluate adjacent sites (run-on) to determine potential contamination issues.	PPD	None	2017	Maintain membership in NEWSOC. Adapt and submit for print one educational item for newspaper articles and/or newsletter articles.
Based upon inventory above, develop plan, initiate discussions and provide educational opportunities that address concerns.	PPD	Specific identified sites	2018	- Report on number of sites identified from inventory. - Number of sites contacted and number of educational items provided.
Offer assistance to local governments with implementing educational program.	PPD	Local Governments & General Public	Ongoing	Number of cooperative agreements or number of requests for educational materials.  <i>Note: If needed, a cooperative working agreement will be developed.</i>
<b>2.1.8 Promote environmentally sensitive land development designs by developers and designers, including green infrastructure and low impact development.</b>				

<b>Action</b>	<b>Responsible Department</b>	<b>Target Audience</b>	<b>Implementation Timeline</b>	<b>Measurable Goals</b>
Develop educational material relating to program goal.	PPD	Developers, Engineers & Contractors	Summer 2017	- Develop educational materials, and update as needed. - Print one educational article for newspaper or newsletter annually.
Inventory, identify and advertise existing sites successfully utilizing green infrastructure or low impact development.	PPD	Developers, Engineers & Contractors	2017 - 2020	Promote existing sites that have implemented program goal through various tools. Develop and distribute one educational material annually.
Hold public forum or tour to explain program goal.	PPD	Developers, Engineers, & Contractors	2017-2020	One event held annually, this may be combined with other programs due to similar goals.
Encourage the use of low impact design for new developments in the County.	PPD	Developers, Engineers, Contractors & General public	2017-2020	Develop and distribute one educational material annually.
Offer assistance to local governments with implementing educational program.	PPD	Local Governments & General Public	Ongoing	Number of cooperative agreements or number of requests for educational materials.  <i>Note: If needed, a cooperative working agreement will be developed.</i>

## Attachment “B”

### **Washington County Public Involvement and Participation (2.2)**

*Goal: To encourage and allow for participation from individuals to prevent storm water pollution.*

Compliance Date: September 6, 2016

Implementation Date: March 6, 2017

#### **Program Objectives**

Develop and implement a program to notify the public of activities required by this permit and to encourage input and participation from the public regarding these activities. This program shall include measurable goals for public involvement and participation and comply with applicable state and local public notice requirements.

#### **Work Plan - Public Involvement and Participation**

It is important that the public are provided an opportunity to provide input and play an active role in the development and implementation of a stormwater quality program. Experience has shown that an active and involved community determines the success of a stormwater management program. Informing the public and encouraging participation will utilize a variety of tools in order to reach a variety of audiences. The tools that will be utilized to educate and seek involvement will include: displays, brochures, newsletters, press releases, website, presentations, workshops and tours, social marketing and personal contacts.

One of the primary resources the county will use to provide information about the MS4 educational program is through an existing Cleanways.org website. This site is a webpage within the Land and Water Conservation Division website titled ‘Clean Ways for Waterways’, an Urban Stormwater Education page. This site will be continually updated in order to provide information on the county’s WPDES MS4 permit; including all components required for compliance with said permit and where future annual reports will be posted. Various county contact information will be provided and viewers will be encouraged to provide input and suggestions on the county’s stormwater program and activities.

Specific public involvement activities that are identified in the Public Education and Outreach Program, see Attachment A, include: presentations and program updates to public officials at open meetings, storm drain stenciling by civic organizations and workshops and/or tours to targeted audiences.

A workgroup of county staff and representatives from local MS4 permitted communities will also be established to help address permit requirements, assist with permit compliance and provide public involvement and participation program leadership.

## Attachment “C”

### **Washington County Illicit Discharge Detection and Elimination (2.3)**

*Goal: Develop a program to identify, prevent, and eliminate illicit discharges to storm sewer systems.*

Compliance Date: March 6, 2017

Implementation Date: September 6, 2017

#### **Program Objective**

Develop, implement and enforce a program to detect and remove illicit connections and discharges to the MS4. The program shall include measurable goals and include all of the following:

- 2.3.1** An ordinance or other regulatory mechanism to prevent and eliminate illicit discharges and connections to the MS4.
- 2.3.2** Initial field screening at all major outfalls during dry weather periods.
- 2.3.3** On-going dry weather field screening of outfalls during the term of the permit. Field screening shall be conducted at selected outfalls on an annual basis. Consideration shall be given to hydrological conditions, total drainage area of the site, population density of the site, traffic density, age of the structures or buildings in the area, history of the area and land use types when selecting outfalls for annual field screening.
- 2.3.4** Procedures for responding to known or suspected illicit discharges.
- 2.3.5** Take appropriate action to remove illicit discharges from its MS4 system as soon as possible. If it will take more than 30 days to remove an illicit connection, the Department shall be contacted to discuss an appropriate action and/or timeframe for removal.
- 2.3.6** In the case of interconnected MS4s, the permittee shall notify the appropriate municipality.
- 2.3.7** The name, title and phone number of the individual(s) responsible for responding to reports of illicit discharges and spills shall be included in the illicit discharge response procedure.

#### **Work Plan – Illicit Discharge Detection and Elimination**

✓ Ordinance Adopted by County Board on 7-12-2016.

Initial field screening scheduled for later in Spring of 2017. On-going monitoring to be conducted by Highway Department personnel during regular road and right-of-way maintenance activities. Training of PPD and Highway Department staff will be scheduled prior to initial screening and anticipated to be an annual need.

**Response plan and contact list to be developed at a later time.**

## Attachment “D”

### **Washington County Construction Site Pollutant Control (2.4)**

*Goal: Adopt/update a soil erosion control ordinance and enforce it on construction sites.*

Compliance Date: September 6, 2016

Implementation Date: March 6, 2017

#### **Program Objective**

Develop, implement and enforce a program to reduce the discharge of sediment and construction materials from construction sites. The program shall establish measurable goals and include:

- 2.4.1** An ordinance or other regulatory mechanism to require erosion and sediment control at construction sites and establish sanctions to ensure compliance.
- 2.4.2** Procedures for construction site inspection and enforcement of erosion and sediment control measures.
- 2.4.3** Procedures for receipt and consideration of information submitted by the public.
- 2.4.4** Procedures for construction site plan review which incorporate consideration of potential water quality impacts.
- 2.4.5** Procedures for the administration of the construction site pollutant control program including the process for obtaining local approval, managing and responding to complaints, and tracking regulated construction sites.

#### **Work Plan – Construction Site Pollutant Control**

✓ Ordinance Adopted by County Board on 7-12-2016.

Model county ordinance provided to all local governments and follow-up will occur in hopes of county-wide adoption of model for consistency purposes. Intergovernmental agreements will be sought with local townships, unincorporated areas, where the county is identified as administering authority.

## Attachment “E”

### **Washington County Post-Construction Storm Water Management (2.5)**

*Goal: Develop/update a post-construction ordinance and enforce it to ensure that areas of new and redevelopment will include structural measures to control pollutants, control peak flow, maintain infiltration, and establish vegetated protective areas adjacent to waterways and wetlands.*

Compliance Date: September 6, 2016

Implementation Date: March 6, 2017

#### **Program Objective**

Develop, implement and enforce a program to require control of the quality of discharges from areas of new development and redevelopment, after construction is completed. The program shall establish measurable goals and include:

- 2.5.1** An ordinance or other regulatory mechanism to regulate post-construction storm water discharges from new development and redevelopment.
- 2.5.2** Procedures that will be used to ensure the long-term maintenance of storm water management facilities.
- 2.5.3** Procedures for the administration of the post-construction storm water management program including the process for obtaining local approval, managing and responding to complaints, and tracking regulated post-construction sites.

#### **Work Plan – Post-Construction Storm Water Management**

✓ Ordinance Adopted by County Board on 7-12-2016.

Model county ordinance provided to all local governments and follow-up will occur in hopes of county-wide adoption of model for consistency purposes. Intergovernmental agreements will sought with local townships, unincorporated areas, where the county is identified as administering authority.

## Attachment “F”

### **Washington County Pollution Prevention (2.6)**

*Goal: Implement practices to prevent pollutants from municipally-owned transportation infrastructure, maintenance areas, storage yards, sand and salt storage areas, and waste transfer stations from entering the storm sewer system.*

Compliance Date: March 6, 2017

Implementation Date: September 6, 2017

#### **Program Objective**

Develop and implement a pollution prevention program that establishes measurable goals for pollution prevention. The program shall include:

- 2.6.1** An inventory of municipally owned or operated structural storm water management facilities.
- 2.6.2** Routine inspection and maintenance of municipally owned or operated structural storm water management facilities to maintain their pollutant removal operating efficiency.
- 2.6.3** Routine street sweeping and cleaning of catch basins with sumps where appropriate.
- 2.6.4** Proper disposal of street sweeping and catch basin cleaning waste.
- 2.6.5** If road salt or other deicers are applied by the permittee, no more shall be applied than necessary to maintain public safety. Information on deicing activities shall be submitted with the annual report.
- 2.6.6** Proper management of leaves and grass clippings, which may include on-site beneficial reuse as opposed to collection.
- 2.6.7** Storm water pollution prevention planning for municipal garages, storage areas and other sources of storm water pollution from municipal facilities.
- 2.6.8** Application of turf and garden fertilizers on municipally controlled properties, with pervious surfaces over 5 acres each, in accordance with a site-specific nutrient application schedule based on appropriate soil tests.
- 2.6.9** Consideration of environmentally sensitive land development designs for municipal projects, including green infrastructure and low impact development.
- 2.6.10** Education of appropriate municipal and other personnel involved in implementing this program.
- 2.6.11** Measures to reduce municipal sources of storm water contamination within source water protection areas.

#### **Work Plan - Pollution Prevention**

**Pollution Prevention plan to be developed at a later time.**

## Attachment “G”

### **Washington County Storm Water Quality Management (2.7)**

*Goal: Control Total Suspended Solids (TSS) carried in storm water from existing urban areas as compared to no controls; achieve the state standard of 20 percent TSS reduction.*

Compliance Date: March 6, 2017

#### **Program Objective**

Develop and implement a municipal storm water management program.

- 2.7.1** To the maximum extent practicable, implementation of storm water management practices necessary to achieve a 20% reduction in the annual average mass of total suspended solids discharging from the MS4 to surface waters of the state as compared to implementing no storm water management controls.
- 2.7.2** Evaluation of all municipal owned or operated structural flood control facilities to determine the feasibility of retrofitting to increase total suspended solids removal from runoff.
- 2.7.3** Assessment of compliance with s. NR 151.13(2)(b)1., Wis. Adm. Code, by conducting a pollutant-loading analysis using a model such as WinSLAMM, P8 or equivalent methodology approved by the Department. At a minimum, the average annual total suspended solids and phosphorus loads to the MS4 shall be determined for the cumulative discharge from all outfalls for the controls and no controls conditions.
- 2.7.4** Source area controls, structural storm water management practices, and non-structural control practices implemented to achieve the 20% reduction in total suspended solids shall be maintained.

#### **Work Plan – Storm Water Quality Management**

Storm Water Quality assessment to be completed at a later time.

## Attachment “H”

### **Washington County Storm Sewer System Maps (2.8)**

*Goal: Develop and maintain a map of the storm sewer system; identifying storm sewer conveyances such as pipes and ditches, and also identify roads, streams and lakes.*

Compliance Date: March 6, 2017

#### **Program Objective**

Develop and maintain a MS4 map. The municipal storm sewer system map shall include:

- 2.8.1** Identification of waters of the state, name and classification of receiving water(s), identification of whether the receiving water is an ORW, ERW or listed as an impaired water under s. 303(d) of the Clean Water Act, storm water drainage basin boundaries for each MS4 outfall and municipal separate storm sewer conveyance systems.
- 2.8.2** Identification of any known wetlands, endangered or threatened resources, and historical property, as defined in sections 1.6 through 1.8 of the permit, which might be affected.
- 2.8.3** Identification of all known MS4 outfalls discharging to waters of the state and other MS4s. Major outfalls shall be uniquely identified.
- 2.8.4** Location of any known discharge to the MS4 that has been issued WPDES permit coverage by the Department.
- 2.8.5** Location of municipally owned or operated structural storm water management facilities including detention basins, infiltration basins, and manufactured treatment devices.
- 2.8.6** Identification of publicly owned parks, recreational areas and other open lands.
- 2.8.7** Location of municipal garages, storage areas and other public works facilities.
- 2.8.8** Identification of streets.

#### **Work Plan – Storm Sewer System Maps**

**Storm Sewer System Map to be completed at a later time.**

## Attachment “I”

### **Washington County Impaired Waters TMDL Implementation (1.5)**

*Goal: Where the storm sewer system discharges a pollutant of concern to an impaired water, a plan shall be developed to reduce those pollutants.*

Compliance Date: By March 31 of each odd-numbered year

#### **Program Objective**

- 1.5.1** Within 90 days after the start date of permit coverage under this permit and by March 31 of each odd-numbered year thereafter, determine whether any part of its MS4 discharges to an impaired waterbody listed in accordance with section 303(d)(1) of the federal Clean Water Act, 33 USC §1313(d)(1)(C), and the implementing regulation of the US Environmental Protection Agency, 40 CFR §130.7(c)(1).
- 1.5.2** If the permittee’s MS4 discharges to an impaired waterbody, the permittee shall include a written section in its storm water management program that discusses the management practices and control measures it will implement as part of its program to reduce, with the goal of eliminating, the discharge of pollutant(s) of concern that contribute to the impairment of the waterbody.
- 1.5.3** After the effective date of this permit, the permittee may not establish a new MS4 discharge of a pollutant of concern to an impaired waterbody or increase the discharge of a pollutant of concern to an impaired waterbody unless the new or increased discharge causes the receiving water to meet applicable water quality standards, or the Department and the USEPA have approved a total maximum daily load (TMDL) for the impaired waterbody. If there is an approved TMDL for the receiving water, the permittee shall comply with Section 1.5.4 below.
- 1.5.4** An MS4 covered under this permit, which is not specifically identified as having a wasteload allocation in a TMDL approved by the Department and the USEPA, shall comply with this section by using the same percent reduction for a pollutant of concern as the city or village in which it is physically located.

#### **Work Plan – Impaired Waters TMDL Implementation**

**Identification of Impaired Waters to be identified in the Storm Sewer Systems Map completed at a later time.**

## Attachment “J”

### **Washington County Annual Reports (2.9)**

*Goal: Annually report on the status of permit requirements and a fiscal analysis on annual expenditures and proposed budget for program activities.*

Compliance Date: By March 31 of each year

#### **Program Objective**

Submit an annual report for each calendar year to the Department by **March 31st of the following year**. The permittee shall invite the municipal governing body, interest groups and the general public to review and comment on the annual report. The annual report shall include:

- 2.9.1** The status of implementing the permit requirements, status of meeting measurable program goals and compliance with permit schedules.
- 2.9.2** A fiscal analysis which includes the annual expenditures and budget for the reporting year, and the budget for the next year.
- 2.9.3** A summary of the number and nature of inspections and enforcement actions conducted to ensure compliance with the required ordinances.
- 2.9.4** Identification of any known water quality improvements or degradation in the receiving water to which the permittee’s MS4 discharges. Where degradation is identified, identify why and what actions are being taken to improve the water quality of the receiving water.
- 2.9.5** An evaluation of program compliance, the appropriateness of identified best management practices, and progress towards achieving identified measurable goals. Any program changes made as a result of this evaluation shall be identified and described in the annual report. For any identified deficiencies towards achieving the requirements under section 2 of this permit or lack of progress towards meeting a measurable goal, the permittee shall initiate program changes to improve their effectiveness.
- 2.9.6** If applicable, notice that the permittee is relying on another municipality to satisfy any of the permit requirements and a description of the arrangement where a permit requirement is being met in this manner.
- 2.9.7** A duly authorized representative of the permittee shall sign and certify the annual report and include a statement or resolution that the permittee’s governing body or delegated representatives have reviewed or been apprised of the content of the annual report. A signed copy of the annual report and other required reports shall be submitted to the appropriate Department regional storm water contact or to the Wisconsin DNR, Storm Water Program – WT/3, P.O. Box 7921, Madison, WI 53707-7921.

**First Annual Report Due: March 31, 2017.**