

**KANSAS STORMWATER 2016 ANNUAL REPORT FORM
FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s)**

Check box if
this is a new name,
address, phone, etc.

Pottawatomie County

Permittee (Agency Name) Mailing Address 1: 612 E. Campbell Street

Mailing Address 2: _____

City: Westmoreland

State: Kansas

Zip Code: 66549

MS4 Program Contact Person: Peter Clark

Contact E-Mail Address: pclark@pottcounty.org

Contact Phone Number: 785-457-3631

Construction Issues Contact Person: Peter Clark

Contact E-Mail Address: pclark@pottcounty.org

Contact Phone Number: 785-457-3631

Kansas Permit Number: M-KS38-SU03

(Example) M – MC21 - SU01

Reporting Period covers activities from January 1, 2016 through December 31, 2016.

This annual report must be submitted to the Kansas Department of Health and Environment (KDHE) by February 28, 2017. This annual report must be submitted as a word or PDF file to KDHE on a standard compact disk (CD). A paper copy of the report may, in addition to the CD, be submitted if the permittee so desires but is not required. **In addition**, provide the current copy of the Stormwater Management Program (SMP) Document as a word or PDF file on the CD.

B. Executive Summary

Append an executive summary to this report which briefly covers the major aspects of the MS4 stormwater management program enacted during the year. In completing the executive summary, the preparer should address the following questions:

1. Were there any aspects of the program that appeared especially effective at reducing pollutants in your stormwater discharge?
2. Were there any aspects of the program that provided unsatisfactory results?
3. What was the most successful part of the program?
4. What was the most challenging aspect of the program?
5. Describe any City/County area MS4 clean-ups and the participation.
6. Describe the elected officials' participation in the stormwater pollution elimination.
7. Describe the collaboration with other organizations to eliminate stormwater pollution.
8. If an audit/inspection of your MS4 program was conducted by EPA or KDHE during the year, list the items the audit/inspection report identified as required changes and provide a narrative explanation of how the changes were implemented or explain the plan to implement the changes and identify a target date for final implementation.

The executive summary does not need to be extensive and detailed. It is anticipated the executive summaries will range from one half of a page to two pages in length depending on the scope of the program.

POTTAWATOMIE COUNTY MS4 ANNUAL REPORT

EXECUTIVE SUMMARY

In 2016, Pottawatomie County engaged in the development of the Stormwater Management Plan (SMP) by acquiring the assistance of Alfred Benesch & Company, a civil engineering consulting firm with expertise in MS4 documentation and procedures. This was the first significant step by the County to engage in the MS4 permit compliance and marked the beginning of the process to implement the MS4 permit requirements in the urbanized area of the southwest corner of the County. This was kicked off with a stakeholder meeting in April, attended by developers, contractors, property owners, HOA boards and elected officials.

This SMP development was very successful and created a usable document that will guide future continued efforts to eventually implement all six of the minimum controls. Along with the SMP document were a full list of supplementary materials that will be very useful in implementing necessary resolutions, inspection and documentation programs, and new design standards that will begin to help reduce pollutants and potential pollutants in the MS4 area.

One of the more challenging aspects of this program that occurred in 2016 and will continue in 2017 is the lack of sufficient staffing and fiscal resources to be able to successfully implement the SMP to its fullest potential, based on the timelines given in the MS4 permit. The County will need to explore the initiation of a stormwater user fee or some other funding mechanism to fund the program execution. This will be primarily in the form of funding an additional staff member tasked with the high volume of documentation and reporting needed to be fully compliant.

An audit was performed by KDHE in August of 2016 based on the 2015 Annual Report, which indicated that the County was not yet compliant with the MS4 permit that was issued in January of 2015. This audit found that two of the Six Minimum Control Measures were not yet implemented, along with the surface water sampling, though the deadlines outlined for the implementation of these in the MS4 Permit had been passed. These two are Public Education and Outreach, Public Involvement and Participation, and along with the surface water sampling program, have not as of yet been fully implemented. It is anticipated that these will have significant progress made in 2017 and will be fully compliant in all aspects of the overall permit by December 31, 2017 with the completed SMP document ready to be implemented.

The Board of County Commissioners adopted the SMP in November of 2016, after multiple briefings and reviews of the document. The SMP was also presented to the County Planning Commission in October 2016 and was recommended for adoption by this body.

The next steps in 2017 will include the adoption of various resolutions that will provide localized regulation of Illicit Discharges, Stormwater Construction Site Runoff, and Post-Construction Best Management Practices. Another significant effort will be in formal establishment of the various inspection processes and procedures and creation of databases for data collection and record keeping. A Stormwater User Fee will be a significant topic of discussion at the local level in order to provide the necessary funding for implementation.

C. Stormwater Management Program

				Place a check mark in the appropriate box.		
	Yes	No	Not Applicable			
1. Has the Stormwater Management Program (SMP) been developed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
2. Has the SMP been modified during this reporting period?	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
3. If the answer to question 2 above was "yes", has the modified SMP been submitted to KDHE for approval?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

If the answer to item 3 is "No" a copy of the modified SMP must be submitted with this annual report. If it is anticipated a measurable goal cannot be met in the next year the SMP should be modified and submitted to KDHE for approval. The modifications may include different BMPs and/or revised goals to avoid being in a position of non-compliance.

D. Total Maximum Daily Load (TMDL) Best Management Practices

				Place a check mark in the appropriate box.		
	Yes	No	Not Applicable			
1. Were any best management practices (BMPs) intended to attenuate the discharge of TMDL regulated pollutants implemented? See your permit to determine if TMDL regulated pollutants are listed for the receiving stream affected by your stormwater system.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
2. List all of the BMPs intended to attenuate the discharge of TMDL regulated pollutants as identified in the SMP and provide the requested information on the following table on the following pages.						

D. Total Maximum Daily Load (TMDL) Best Management Practices (Table)

BMP ID Number	Brief BMP Description	Regulated TMDL Parameter	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
7.A To reduce the amount of bacteria entering the Kansas River, to the MEP, by utilizing bacteria reduction BMPs	1.C BMP: Gather, prepare, and distribute educational materials at Pottawatomie County government facilities	B, N, S	1.C.1 Starting in 2017, Pottawatomie County shall provide stormwater/pollution prevention related educational pamphlets at Pottawatomie County government facilities.	Materials acquired in 2016
7.B To reduce the amount of Nutrients entering the Kansas River, to the MEP, by utilizing nutrient reduction BMPs	1.D BMP: Provide stormwater related news and information to the public concerning Total Maximum Daily Load (TMDL) related pollutants affecting Pottawatomie County MS4 area.	B, N, S	1.D.1 In 2018, Pottawatomie County shall, at a minimum of four (4) times per year, include TMDL pollutant related educational/informational material (ex. pamphlet, information sheet, etc.) through media of County's choice which may include but is not limited to; sewer bills, Everbridge, or email blasts.	Materials acquired in 2016
7.C To reduce the amount of sediment entering the Kansas River, to the MEP, by utilizing sediment reduction BMPs	1.E BMP: Educate school children on stormwater pollution related issues	B, N, S	1.E.1 Pottawatomie County shall provide coloring books, stickers, etc. to local schools for distribution to students at least once per year.	Materials acquired in 2016
	3.A BMP: Develop and implement resolutions ,as allowed by State law, that define illicit discharges and non-stormwater discharges that are allowable, legal authority to conduct inspections enact penalties for noncompliance and enforcement options.	B, N	3.A.1 In 2017 Pottawatomie County shall adopt resolutions that define and prohibit illicit discharges as well as establish an enforcement and penalty framework for failure to uphold these resolutions.	Draft Resolution acquired in 2016
	3.C BMP: Establish methods for public and employees to report illicit discharges.	B, N	3.C.1 In 2018 Pottawatomie County shall create a phone number for the specific purpose of reporting suspected illicit discharges.	No Progress
3.C.2 In 2018 Pottawatomie County shall create an email address for the purpose of the reporting illicit discharge.			No Progress	
3.C.3 Once the number is established, Pottawatomie County shall advertise and promote the number and email address to public by including these on the County website.			No Progress	

	3.D BMP: Implement and maintain an inspection program for all major outfalls and investigation of a suspected illicit discharge within the MS4 service area.	B, N	3.D.1 By the end of 2017, Pottawatomie County shall delineate watersheds and identify major outfalls. Major outfalls are defined as the end structure of a man made stormwater conveyance system (i.e. pipe system or non-earth/rock lined channel) with the open area equal to or greater than a 12" (12-inch) diameter circle in industrial zoned areas or 36" (36-inch) in non-industrial zoned areas.	Outfall Maps are Completed
	3.D.2 By the end of 2017, Pottawatomie County shall develop and implement procedures for major outfall inspections, investigating and tracking a suspected illicit discharge to the source, sampling and sample analysis of a suspected illicit discharge, source elimination, enforcement and follow up procedures.		Draft Procedure completed in 2016	
	3.D.3 In 2018 Pottawatomie County shall begin Dry Weather Outfall Inspections and investigation of suspected illicit discharges in accordance with above drafted procedures.		No Progress	
	3.H BMP: Coordinate with Public Education and Outreach personnel to spread the message about hazards of Illicit Discharges	B, N	3.H.1 Beginning in 2018, Pottawatomie County shall identify likely illicit discharges in the community to address. The County will then select a brochure or other educational material to distribute that will educate the public about illicit discharges and how to prevent them. The distribution of the materials will be conducted through the Public Education and Outreach program.	Materials acquired in 2016
	4.A BMP: Develop Resolutions, as allowed by State law, to address construction site stormwater runoff control.	S	4.A.1 In 2017 Pottawatomie County shall develop and implement resolutions, as allowed by State law, to require erosion and sediment controls, as well as sanctions to ensure compliance.	Draft Resolution acquired in 2016
	4.B BMP: Develop and implement planning requirements for construction site owners and operators to implement appropriate	S	4.B.1 In 2017 Pottawatomie County shall adopt KDHE Stormwater Runoff from Construction Activities as governing document for design and submittal requirements. Including developing a Stormwater Pollution Prevention Plan (SWPPP).	Regulation Reviewed in 2016

	BMPs for erosion and sediment control.		4.B.2 In 2017 Pottawatomie County shall adopt design standards (details and specifications) for erosion and sediment control.	Design Standards Reviewed in 2016
			4.B.3 In 2018 Pottawatomie County shall create and implement planning requirements for plans to include erosion and sediment control designs and details. Pottawatomie County shall update existing planning requirements, forms and website information to include new requirements.	Draft Planning Requirements completed in 2016
	4.C BMP: Develop and implement procedures for site plan review which incorporate consideration of potential water quality impacts	S	4.C.1 Beginning in 2018, Pottawatomie County shall incorporate plan review for all projects which require erosion and sediment control in accordance with County resolutions. The erosion and sediment control plans and SWPPP reviews will be conducted by Public Works	Draft Procedure completed in 2016
			4.C.2 Beginning in 2018, the Zoning Office will submit erosion and sediment control plans and SWPPP to Public Works for review in compliance with adopted planning and design requirements.	Draft Procedure completed in 2016
	4.D BMP: Develop and implement a tracking and documentation system for construction site inspections.	S	4.D.1 Beginning in 2018, Pottawatomie County shall develop and implement procedures for documenting inspections, enforcement and scheduling follow up inspections for non-compliant sites.	Draft Procedure completed in 2016
			4.D.2 In 2019 Pottawatomie County shall use existing software to track and document plan review and approval, construction site inspections, enforcement actions taken, and follow up inspections.	No inspections conducted in 2016
	4.E BMP: Establish procedures for the receipt and consideration of information submitted by the public	S	4.E.1 In 2017 Pottawatomie County shall develop and implement methods that allow the public to submit information to Pottawatomie County regarding construction sites and appropriate responses the County may take in regards to the information submitted. The methods may include a phone number, email address, or address for the concerned citizen to contact the County. The manner in which the information may be submitted may include listing the contact information on the County website.	Draft Procedure completed in 2016

	4.F BMP: Create and implement an inspection and enforcement program	S	4.F.1 In 2018, shall develop procedures for site inspections, enforcement, follow up inspections and penalties.	Draft Procedure completed in 2016
	4.G BMP: Train and educate personnel who will inspect construction sites	S	4.G.1 Beginning in 2018, Pottawatomie County shall select a training program or procure the necessary materials to train personnel. Training topics shall include: County erosion and sediment control requirements, proper installation of erosion and sediment control BMPs, reviewing SWPPPs, and/or all procedures required to conduct inspections.	List of Training Programs Selected
			4.G.2 Beginning in 2018, Pottawatomie County shall train inspectors with the established training program	No training completed
	4.H BMP: Conduct construction site inspections of erosion and sediment control BMPs and SWPPPs, enforcement and follow up actions in accordance with the adopted resolutions, standards and procedures.	S	4.H.1 In 2019 Pottawatomie County shall begin conducting erosion control inspections for development activities as described in the SOPs.	No inspections conducted
	5.A BMP: Develop Resolutions, as allowed by the State, to address Post-Construction Stormwater Management in new development and redevelopment projects.	S	5.A.1 In 2017, Pottawatomie County shall develop resolutions to prevent or minimize adverse water quality impacts through strategies that include non-structural and structural BMPs	Draft Resolution acquired in 2016
	5.B BMP: Develop and adopt standards for the design and construction of post-construction Best Management Practices (BMPs).	S	5.B.1 In 2017 Pottawatomie County shall adopt design standards, construction standards and specifications relating to BMPs.	Design Standards Reviewed in 2016
	5.C BMP: Develop and implement procedures for reviewing plan and drainage studies for conformance with adopted design and construction standards and specifications.	S	5.C.1 In 2018, Pottawatomie County shall incorporate plan review for all projects which require stormwater treatment BMPs in accordance with County resolutions. Construction plans and the related stormwater drainage studies/calculations shall be reviewed by Public Works for compliance with the adopted design standards for applicable projects.	Draft Procedure completed in 2016
	5.D Develop and implement a program to ensure BMPs are	S	5.D.1 In 2018, Pottawatomie County shall develop and implement a program of inspecting privately	Draft Procedure completed in 2016

	constructed as designed through all project construction phases.		owned structural BMPs throughout the construction process.	
			5.D.2 In 2018 Pottawatomie County shall develop and implement procedures for inspecting (constructed), enforcement and documenting BMP inspections by County and by owners	Draft Procedure completed in 2016
			5.D.3 In 2019 Pottawatomie County shall begin conducting inspections of privately owned BMPs during phases of the construction process in coordination with the contractor installing the structural BMP	No inspections completed
5.E Develop and implement a program to ensure structural BMPs are being maintained and in good working order by owners	S		5.E.1 In 2017, in accordance with the adopted resolution, Pottawatomie County shall require that owners inspect and certify that BMPs are being maintained and functioning properly.	No records obtained in 2016
			5.E.2 In 2018 Pottawatomie County shall develop or procure forms, owner instructions and other documentation for inspections of applicable BMPs and be provided to owners and designers. These materials will be updated as needed on an annual basis.	No records obtained in 2016
5.F Develop and implement a tracking and documentation system for post-construction inspections	S		5.F.1 In 2018 Pottawatomie County shall develop and implement procedures for documentation of inspections during construction, records of engineer certification of BMPs, enforcement and follow up inspections.	Draft Procedure completed in 2016
			5.F.2 In 2018 Pottawatomie County shall use existing software to track and document post-construction inspections	No inspections completed
5.G BMP: Develop and implement a program to educate owners, designers and developers on post-construction BMPs and Pottawatomie County's program	B, N, S		5.G.1 In 2019 Pottawatomie County shall develop a training/educational program that covers one or more of the following: Pottawatomie County post-construction stormwater management program elements, preferred BMPs to use in County, design and construction standards, and maintenance requirements	Draft Procedure completed in 2016
			5.G.2 In 2019 Pottawatomie County shall contact and inform local contractors, owners, and designers about upcoming event	No events in 2016

			5.G.3 Beginning in 2019 Pottawatomie County shall conduct training and/or putting together an educational conference	
	8.D BMP: Utilize the data gathered from sample results.	B, N, S	8.D.1 In 2017, Pottawatomie County shall begin using the data gathered during the year to develop trend lines for the parameters identified in the permit.	No data collection in 2016
8.D.2 In 2019, Pottawatomie County shall begin prepare a technical memo summarizing analysis of data and trends in data			No data collection in 2016	
8.D.3 In 2019, Pottawatomie County shall begin utilizing the results and trends to enhance the program and, if applicable, identify watersheds to focus additional BMPs to aid in reduction of TMDL regulated pollutants. The laboratory results shall be compared to other scientific study(s) that establish "acceptable" limits in urban streams such as EPA NURP			No data collection in 2016	
7.D Utilize trend analysis data obtained through monitoring activities to evaluate potential impact of runoff from MS4 entering the Kansas River	To determine water quality trends of stormwater runoff entering the Kansas River and effectiveness of the BMPs on the reduction of TMDL regulated pollutants.	B, N, S	Based on laboratory analysis and trend analysis of samples obtained during wet weather event, Pottawatomie County will compare the results with KDHE acceptable limits of pollutants in streams and/or other scientific study(s) that establish "acceptable" limits in urban streams such as EPA National Urban Runoff Program (NURP), and evaluate the quality of runoff. The obtained results will be used for comparison in subsequent years.	No Samples yet obtained to begin trend analysis
7.E Prepare and maintain maps	To locate spatially the permit area, structural BMPs, stream monitoring locations, and MS4 outfalls draining to the Kansas River.	B, N, S	7.E.1 In 2016 Pottawatomie County shall prepare and maintain a map illustrating the Permit Area maintain a map illustrating the Permit Area	Map Completed
			7.E.2 In 2016 Pottawatomie County shall prepare and maintain a map illustrating the locations of structural BMPs	Map Completed

			7.E.3 In 2016 Pottawatomie County shall prepare and maintain a map illustrating the structural BMP's influent/effluent, lake and stream monitoring locations	Map Completed
			7.E.4 In 2016 Pottawatomie County shall prepare maintain a map illustrating the storm sewer collection system including outfalls within the MS4 draining to the TMDL listed impaired streams or lakes	Map Completed

E. Stormwater Management Program Requirements (Six Minimum Control Measures)**1. Public Education and Outreach (Table)**

List all of the public education and outreach BMPs as identified in the SMP and provide the requested information in the following table. (List presentations & media)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
1.A	Provide stormwater related educational information and materials on the County Website.	1.A.1 By the end of 2017, Pottawatomie County shall provide stormwater related materials on its' website and/or create a Stormwater webpage. The information shall include such things as names and contact information of stormwater program personnel, downloadable educational documents and the SMP.	Materials acquired in 2016, no website activity
		1.A.2 For the duration of the MS4 program, Pottawatomie County shall update the webpage with new materials and information annually or as deemed necessary by the Public Works Director.	Materials acquired in 2016, no website activity
1.B	Provide educational materials focused on erosion and sediment control to the public.	1.B.1 Beginning in 2017, Pottawatomie County shall obtain educational materials concerning Erosion and Sediment Control (E&SC).	Materials acquired in 2016
		1.B.2 Beginning in 2017, Pottawatomie County shall visit at least two (2) construction sites and distribute E&SC educational materials to contractors.	No visits in 2016
		1.B.3 Beginning in 2017, Pottawatomie County shall distribute erosion and sediment control educational materials to contractors/owners as they apply for a building permit.	No distribution in 2016

1.C	Gather, prepare, and distribute educational materials at Pottawatomie County government facilities	1.C.1 Starting in 2017, Pottawatomie County shall provide stormwater/pollution prevention related educational pamphlets at Pottawatomie County government facilities.	Materials acquired in 2016
1.D	Provide stormwater related news and information to the public concerning Total Maximum Daily Load (TMDL) related pollutants affecting Pottawatomie County MS4 area.	1.D.1 In 2018, Pottawatomie County shall, at a minimum of four (4) times per year, include TMDL pollutant related educational/informational material (ex. pamphlet, information sheet, etc.) through media of County's choice which may include but is not limited to; sewer bills, Everbridge, or email blasts.	Spoke on radio (1350 KMAN) regarding MS4 Program (Sept 2016)
1.E	Educate school children on stormwater pollution related issues	1.E.1 Pottawatomie County shall provide coloring books, stickers, etc. to local schools for distribution to students at least once per year.	Materials acquired in 2016, no distribution

2. Public Involvement and Participation (Table)

List all of the public involvement and participation BMPs as identified in the SMP and provide the requested information in the following table. (List all associations & partnerships)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
2.A	Establish public involvement in MS4 Programs	<p>2.A.1 In 2017 shall consider creating an advisory committee or committees made up of local citizens and County personnel that would assist in stormwater related issue(s) as deemed necessary by the Public Works Director. The stormwater related issues may include assistance with creating resolutions for Construction Site Stormwater Runoff Control, Post-Construction Stormwater Management and BMPs, or a Citizen Advisory Board.</p>	<p>SMP Creation was kicked off with a Stakeholder meeting with Developers, engineers, contractors and home owners in MS4 area (4/27/16)</p> <p>Framework for advisory committee organization created, positions not yet filled in 2016</p>
2.B	Engage Kansas State University (KSU) to assist County with stormwater related and pollution prevention activities	<p>2.B.1 Beginning in 2017, Pottawatomie County shall contact KSU Engineering Department and discuss ways they might be able to assist in stormwater sampling, testing, and analysis.</p>	<p>Contact made with KSU Civil Engineering Department (Sept 2016)</p>

2. Illicit Discharge Detection and Elimination

Place a check mark in the appropriate box.

Explain each item below in following table.

	Yes	No	Not Applicable
1. Has a program/plan been developed and is it presently implemented to detect and address illicit/prohibited discharges into the MS4?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. Has a map of the MS4 been developed, showing the location of all outfalls, either pipes or open channel drainage, showing names and location of all streams or lakes receiving discharges from the outfalls?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. The permit requires the permittee enact ordinances Resolutions or regulations. Has an ordinances, resolutions or regulations to prohibit non-stormwater discharges into the storm system been enacted?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Effective Date: _____			
Has the ordinance, resolution or regulation been modified?			
Effective Date: _____			
4. Has the ordinance, resolution or regulation and/or modification been submitted to KDHE for approval?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. Have public employees, business, and the general public been informed of the hazards associated with illegal discharges and improper disposal of waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6. Are stormwater inlets & detention ponds inspected for illicit discharges and debris?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7. Are restaurant waste grease areas inspected?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8. Are septic systems inspected?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
9. Are debris, yard waste and dead animals removed from the streets when noticed by employees or reported?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10. Is there a yard waste management program?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
11. Are snow removal activities inspected?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
12. List all of the illicit discharge detection and elimination BMPs as identified in the SMP and provide the requested information in the table on the following pages.			

3. Illicit Discharge Detection and Elimination (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
3.A	Develop and implement resolutions ,as allowed by State law, that define illicit discharges and non-stormwater discharges that are allowable, legal authority to conduct inspections enact penalties for noncompliance and enforcement options.	3.A.1 In 2017 Pottawatomie County shall adopt resolutions that define and prohibit illicit discharges as well as establish an enforcement and penalty framework for failure to uphold these resolutions.	Draft Resolution acquired in 2016
3.B	Develop, implement, and maintain a thorough IDDE mapping system	3.B.1 Pottawatomie County shall identify mapping system needs by reviewing current mapping capabilities and available information	GIS Mapping system in place
		3.B.2 If necessary, Pottawatomie County shall update GIS databases, and maps in order to satisfy mapping needs.	Mapping needs met in 2016
		3.B.3 Pottawatomie County shall verify GIS data accurately represents assets in the field through field checks.	Existing Stormwater GIS layers have been verified in the field in 2016
		3.B.4 Pottawatomie County shall develop and update, as needed, a map of the MS4 showing the location of all major outfalls as well as names and locations of all waters of the U.S. that receive discharges from those outfalls.	Map created in 2016
3.C	Establish methods for public and employees to report illicit discharges.	3.C.1 In 2018 Pottawatomie County shall create a phone number for the specific purpose of reporting suspected illicit discharges.	No progress
		3.C.2 In 2018 Pottawatomie County shall create an email address for the purpose of the reporting illicit discharge.	No progress

		3.C.3 Once the number is established, Pottawatomie County shall advertise and promote the number and email address to public by including these on the County website.	No progress
3.D	Implement and maintain an inspection program for all major outfalls and investigation of a suspected illicit discharge within the MS4 service area.	3.D.1 By the end of 2017, Pottawatomie County shall delineate watersheds and identify major outfalls. Major outfalls are defined as the end structure of a man made stormwater conveyance system (i.e. pipe system or non-earth/rock lined channel) with the open area equal to or greater than a 12" (12-inch) diameter circle in industrial zoned areas or 36" (36-inch) in non-industrial zoned areas.	Map created in 2016
		3.D.2 By the end of 2017, Pottawatomie County shall develop and implement procedures for major outfall inspections, investigating and tracking a suspected illicit discharge to the source, sampling and sample analysis of a suspected illicit discharge, source elimination, enforcement and follow up procedures.	Draft Procedure completed in 2016
		3.D.3 In 2018 Pottawatomie County shall begin Dry Weather Outfall Inspections and investigation of suspected illicit discharges in accordance with above drafted procedures	No inspections performed
3.E	Develop and implement a tracking and documentation system for IDDE Dry Weather Inspections and investigation of suspected illicit discharges.	3.E.1 In 2017 Pottawatomie County shall implement and maintain a tracking and documenting system utilizing existing software.	Tracking system outlined but not implemented

3.F	Create and implement a training program for illicit discharge inspection, outfall inspections, and sampling	3.F.1 In 2018 Pottawatomie County shall determine the training needs of staff for illicit discharge investigations, tracking, sampling, and dry weather outfall inspections. Pottawatomie County will select a training program that will include at a minimum: dry weather inspection of outfalls, identifying illicit discharges, collecting samples, tracking suspected illicit discharges.	Training has been identified in 2016
		3.F.2 Beginning in 2018, Pottawatomie County shall train county personnel responsible for illicit discharge investigations, sampling and outfall inspections as per training requirements	No training has been performed in 2016
		3.F.3 If volunteers are utilized in public participation, Pottawatomie County shall teach them how to identify illicit discharges	No public volunteer participation in 2016
3.G	Document recycling and household hazardous waste (HHW) collection efforts undertaken in the County.	3.G.1 Beginning in 2017, Pottawatomie County shall document and report household hazardous waste collection efforts within Pottawatomie County	HHW is currently collected and documented in 2016 at the Transfer Station (outside MS4 area)
3.H	Coordinate with Public Education and Outreach personnel to spread the message about hazards of Illicit Discharges	3.H.1 Beginning in 2018, Pottawatomie County shall identify likely illicit discharges in the community to address. The County will then select a brochure or other educational material to distribute that will educate the public about illicit discharges and how to prevent them. The distribution of the materials will be conducted through the Public Education and Outreach program.	Materials identified in 2016

3. Construction Site Stormwater Runoff Control

Place a check mark in the appropriate box.

Explain each item below in following table.

Yes No Not Applicable

1. The permit requires the permittee to enact ordinances, resolutions or regulations. Has an ordinance, resolutions or regulation to address construction site runoff from new development and redevelopment projects been enacted?

Effective Date: _____

2. Has a copy of the ordinance, resolution or regulation been submitted to KDHE as required by the permit?

3. Has a procedure or program been developed requiring construction site owners and/or operators to implement appropriate erosion and sediment control best management practices?

4. Has a procedure or program been developed requiring construction site owners and/or operators to control waste such as discarded building materials, concrete truck washout, chemicals, paint, litter and sanitary waste at construction sites likely to cause adverse impacts to water quality?

5. Has a procedure been developed and implemented requiring site plan review of erosion control and debris container locations incorporating consideration of potential water quality impacts?

6. After review, is a construction site permit issued?

7. Has a procedure been developed for the receipt and consideration of information submitted by the public?

8. Has a procedure been developed and implemented for construction site inspection and enforcement of the control measures?

9. Are construction site inspection and enforcement actions successful?

10. Are site owners and/or operators provided instruction On proper construction site erosion and waste control?

11. List all the construction site stormwater runoff control BMPs as identified in the SMP and provide the requested information in the table on the following pages.

4. Construction Site Stormwater Runoff Control (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
4.A	Develop Resolutions, as allowed by State law, to address construction site stormwater runoff control.	4.A.1 In 2017 Pottawatomie County shall develop and implement resolutions, as allowed by State law, to require erosion and sediment controls, as well as sanctions to ensure compliance.	Draft Resolution acquired in 2016
4.B	Develop and implement planning requirements for construction site owners and operators to implement appropriate BMPs for erosion and sediment control.	4.B.1 In 2017 Pottawatomie County shall adopt KDHE Stormwater Runoff from Construction Activities as governing document for design and submittal requirements. Including developing a Stormwater Pollution Prevention Plan (SWPPP).	Documents reviewed in 2016
		4.B.2 In 2017 Pottawatomie County shall adopt design standards (details and specifications) for erosion and sediment control.	Documents reviewed in 2016
		4.B.3 In 2018 Pottawatomie County shall create and implement planning requirements for plans to include erosion and sediment control designs and details. Pottawatomie County shall update existing planning requirements, forms and website information to include new requirements.	Documents drafted in 2016
4.C	Develop and implement procedures for site plan review which incorporate consideration of potential water quality impacts	4.C.1 Beginning in 2018, Pottawatomie County shall incorporate plan review for all projects which require erosion and sediment control in accordance with County resolutions. The erosion and sediment control plans and SWPPP reviews will be conducted by Public Works	Plan review procedure drafted in 2016

		4.C.2 Beginning in 2018, the Zoning Office will submit erosion and sediment control plans and SWPPP to Public Works for review in compliance with adopted planning and design requirements.	Coordination discussed in 2016
4.D	Develop and implement a tracking and documentation system for construction site inspections.	4.D.1 Beginning in 2018, Pottawatomie County shall develop and implement procedures for documenting inspections, enforcement and scheduling follow up inspections for non-compliant sites.	Procedure drafted in 2016
		4.D.2 In 2019 Pottawatomie County shall use existing software to track and document plan review and approval, construction site inspections, enforcement actions taken, and follow up inspections.	No tracking performed in 2016
4.E	Establish procedures for the receipt and consideration of information submitted by the public	4.E.1 In 2017 Pottawatomie County shall develop and implement methods that allow the public to submit information to Pottawatomie County regarding construction sites and appropriate responses the County may take in regards to the information submitted. The methods may include a phone number, email address, or address for the concerned citizen to contact the County. The manner in which the information may be submitted may include listing the contact information on the County website.	No progress
4.F	Create and implement an inspection and enforcement program	4.F.1 In 2018, shall develop procedures for site inspections, enforcement, follow up inspections and penalties.	Procedure drafted in 2016
4.G	Train and educate personnel who will inspect construction sites	4.G.1 Beginning in 2018, Pottawatomie County shall select a training program or procure the necessary materials to train personnel. Training topics shall include: County erosion and sediment control requirements, proper installation of	Training identified in 2016

		erosion and sediment control BMPs, reviewing SWPPPs, and/or all procedures required to conduct inspections.	
		4.G.2 Beginning in 2018, Pottawatomie County shall train inspectors with the established training program	No training performed in 2016
4.H	Conduct construction site inspections of erosion and sediment control BMPs and SWPPPs, enforcement and follow up actions in accordance with the adopted resolutions, standards and procedures.	4.H.1 In 2019 Pottawatomie County shall begin conducting erosion control inspections for development activities as described in the SOPs.	No inspections performed in 2016

5. Post-Construction Site Stormwater Management in New Development and Redevelopment.

Place a check mark in the appropriate box.

Explain each item below in following table.

Yes

No

1. The permit requires the permittee to enact a program to address post-construction site stormwater runoff from new development and redevelopment.

The program developed to manage stormwater in new development and redevelopment projects must include the following elements:

- a. Strategies which include a combination of structural and/or Non-structural BMPs,
- b. Measures to ensure adequate long-term operation and maintenance of BMPs,
- c. Site Owner or operator name and telephone number Responsible to ensure adequate long-term operation Maintenance of BMPs,
- d. BMPs to prevent or minimize adverse water impacts.

2. Has a post-construction stormwater runoff program been Implemented?

3. Has post-construction sites been inspected?

4. Have there been post-construction violations?

5. List all the post-construction site stormwater management in new development and redevelopment BMPs as identified in the SMP and provide the requested information in the table on the following pages.

5. Post-Construction Site Stormwater Management in New Development and Redevelopment Table

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
5.A	Develop Resolutions, as allowed by the State, to address Post-Construction Stormwater Management in new development and redevelopment projects.	5.A.1 In 2017, Pottawatomie County shall develop resolutions to prevent or minimize adverse water quality impacts through strategies that include non-structural and structural BMPs	Resolutions Drafted in 2016
5.B	Develop and adopt standards for the design and construction of post-construction Best Management Practices (BMPs).	5.B.1 In 2017 Pottawatomie County shall adopt design standards, construction standards and specifications relating to BMPs.	Draft Design Standards reviewed in 2016
5.C	Develop and implement procedures for reviewing plan and drainage studies for conformance with adopted design and construction standards and specifications.	5.C.1 In 2018, Pottawatomie County shall incorporate plan review for all projects which require stormwater treatment BMPs in accordance with County resolutions. Construction plans and the related stormwater drainage studies/calculations shall be reviewed by Public Works for compliance with the adopted design standards for applicable projects.	Procedure drafted in 2016
5.D	Develop and implement a program to ensure BMPs are constructed as designed through all project construction phases.	5.D.1 In 2018, Pottawatomie County shall develop and implement a program of inspecting privately owned structural BMPs throughout the construction process.	Program drafted in 2016
		5.D.2 In 2018 Pottawatomie County shall develop and implement procedures for inspecting (constructed), enforcement and documenting BMP inspections by County and by owners	Procedures drafted in 2016
		5.D.3 In 2019 Pottawatomie County shall begin conducting inspections of privately owned BMPs during phases of the construction process in coordination with the contractor installing the structural BMP	No inspections performed in 2016

5.E	Develop and implement a program to ensure structural BMPs are being maintained and in good working order by owners	5.E.1 In 2017, in accordance with the adopted resolution, Pottawatomie County shall require that owners inspect and certify that BMPs are being maintained and functioning properly.	No documentation performed in 2016
		5.E.2 In 2018 Pottawatomie County shall develop or procure forms, owner instructions and other documentation for inspections of applicable BMPs and be provided to owners and designers. These materials will be updated as needed on an annual basis.	No documentation performed in 2016
5.F	Develop and implement a tracking and documentation system for post-construction inspections	5.F.1 In 2018 Pottawatomie County shall develop and implement procedures for documentation of inspections during construction, records of engineer certification of BMPs, enforcement and follow up inspections.	Procedures drafted in 2016
		5.F.2 In 2018 Pottawatomie County shall use existing software to track and document post-construction inspections	No documentation performed in 2016
5.G	Develop and implement a program to educate owners, designers and developers on post-construction BMPs and Pottawatomie County's program	5.G.1 In 2019 Pottawatomie County shall develop a training/educational program that covers one or more of the following: Pottawatomie County post-construction stormwater management program elements, preferred BMPs to use in County, design and construction standards, and maintenance requirements	Program outlined in 2016
		5.G.2 In 2019 Pottawatomie County shall contact and inform local contractors, owners, and designers about upcoming event	No event performed in 2016
		5.G.3 Beginning in 2019 Pottawatomie County shall conduct training and/or putting together an educational conference	No event performed in 2016

6. Municipal Pollution Prevention/Housekeeping.

Place a check mark in the appropriate box.

Explain each item below in following table.

	Yes	No
1. The permit requires the permittee to enact a program to address Pollution Prevention/Good Housekeeping for Municipal Operations.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Has an operation & maintenance program to reduce Pollutant runoff and an audits /inspection program been adopted?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Has a municipal employee training program been established?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Are oil, hazardous wastes, chemicals and municipal debris properly deposited?	<input type="checkbox"/>	<input type="checkbox"/>
5. Are snow and ice removal material and chemicals properly managed to prevent runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Are municipal streets swept on a regular basis?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Are municipal stormwater inlets and drains inspected and cleaned?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Are municipal snow piles controlled drainage to prevent runoff pollution?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

List all the Municipal Pollution Prevention/Housekeeping BMPs as identified in the SMP and provide the requested information on the table on the following pages.

7. PHASE I OPERATORS ONLY - Monitoring Industrial and High Risk Run-off

Place a check mark in the appropriate box.

	Yes	No
1. Has the permittee developed and maintained a list of the municipal industrial facilities contributing to the pollutant loading to the municipal storm sewer system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Has at least two municipal industrial facilities on the list had inspection and sampling conducted?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to items 1 and 2 is "No" provide a statement on the Phase I operator form Appendix B as to why monitoring and control has not occurred.

Complete Monitoring form in Appendix B.

6. Municipal Pollution Prevention/Housekeeping Table

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
6.A	Increase awareness of and reduce potential pollution from Pottawatomie County facilities through education.	6.A.1 In 2017 Pottawatomie County shall review current chemicals utilized outdoors by various departments for proper handling, storage, application, and disposal. And review spill prevention and cleanup procedures at facilities with chemicals.	Procedure review performed by the single municipal facility in the MS4 area (old WWTP Building)
6.B	Develop and distribute Pollution Prevention/Good Housekeeping educational materials to County employees.	6.B.1 In 2017 Pottawatomie County shall obtain or produce educational materials that address good housekeeping and pollution prevention and distribute to employees.	Materials acquired in 2016

F. Recordkeeping and Reporting

Attach a report which addresses the following subjects:

1. A general assessment of the appropriateness of the various BMPs included for each of the major program elements as follows:
 - a. TMDL regulated pollutants (Appendix A contains TMDL Report Forms)
 - b. Public Education and Outreach
 - c. Public Involvement and Participation
 - d. Illicit Discharge Detection and Elimination
 - e. Construction Site Stormwater Runoff Control
 - f. Post-Construction Site Stormwater Management in New Development and Redevelopment
 - g. Pollution Prevention/Good Housekeeping for Municipal Operations

Issues which may be addressed include:

- a. Are the BMPs appropriate for local population?
 - b. Are the BMPs appropriate for the pollution sources?
 - c. Are there specific concerns related to the local receiving waters that may justify a change in BMPs?
2. An assessment of the effectiveness of the BMPs towards achieving the statutory goal of reducing the discharge of pollutants to the Maximum Extent Practicable (MEP).
 3. Provide a summary of results of information collected and analyzed, if any, during the reporting period, including any monitoring data used to assess the success of the SMP.
 4. Provide a summary of the planned changes in stormwater activities which are scheduled to be undertaken during the next annual reporting cycle. This should address the implementation of new BMPs and/or the deletion of BMPs and include a projected schedule for the month or quarter when the BMP will be either implemented or discontinued. Please note a revised SMP should be submitted for KDHE approval if BMPs are revised.
 5. Provide a list of other municipalities/contractors, if any, which will be responsible for implementing any of the program areas of the SMP.

Recordkeeping and Reporting – Pottawatomie County

At this time the SMP document is found to be appropriate for the required work that is necessary to comply with the County's MS4 permit. Though no significant amount of work has yet been completed in any of the Six Minimum Controls, there is anticipated to be a significant effort on the County's behalf to fully comply with all the MS4 Permit timelines up to those that are required by December 31, 2017. With the insignificant progress on the Six Minimum Controls, there is no substantive amount of data to report at this time.

Items of significant work will be in the areas of Public Education and Outreach, where the County website will be updated with a new stormwater page that will contain the necessary materials for educating and informing the public and contractors of stormwater issues and regulations. For Public Involvement and Participation, there is a significant effort planned to organize a Stormwater Advisory Committee that will review and provide recommendations for the three resolutions that will be presented for approval in 2017: Illicit Discharge Detection and Elimination Resolution, Construction Site Stormwater Runoff Resolution, and the Post-Construction BMP Resolution.

Effort will also begin in kicking off the surface water sampling program, by either contracting with the City of Manhattan for this service or utilizing volunteer forces from the Civil Engineering Department from Kansas State University to collect and analyze the four necessary samples to be compliant with the permit.

Lastly, a significant effort will be made to begin the discussion of a stormwater user fee that could be established to sustainably fund this stormwater program, both with sufficient staffing and also material resources so that this program can be as successful as possible.

G. Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature of Permittee:  Date Signed: 2-27-17
(Legally responsible person)

Name (printed): Peter Clark Title: Public Works Director

40 CFR 122.22 Signatories to permit applications and reports.

(a) Application. All permit applications shall be signed by either a principal executive officer or ranking elected official.

All reports required by permits, and other information requested by the Director shall be signed by a person described in paragraph (a) of this section, or by a duly authorized representative of that person.

Submit this report to:

KANSAS DEPARTMENT OF HEALTH & ENVIRONMENT

Municipal Programs Section
1000 SW Jackson Street, Suite 420
Topeka, Kansas 66612-1367