

LEHI CITY

STORMWATER MANAGEMENT PROGRAM

Submitted to:

State of Utah
Department of Environmental Quality
Division of Water Quality



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**LEHI CITY
STORMWATER MANAGEMENT PROGRAM**

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GLOSSARY

BMP	Best Management Practices
CWA	Clean Water Act
EMC	Event Mean Concentration
EPA	United States Environmental Protection Agency
ESU	Equivalent Service Unit
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NOT	Notice of Termination
NPDES	National Pollutant Discharge Elimination System
SWMP	Stormwater Management Program
SWPPP (SW3P)	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
UPDES	Utah Pollutant Discharge Elimination System
DWQ	Utah Division of Water Quality

INTRODUCTION

This document presents the City of Lehi Stormwater Management Plan (SWMP). It provides a comprehensive strategy that will outline and direct the City of Lehi Storm Sewer Utility's priorities and activities for the years 2010 – 2015. This SWMP has been developed to meet the requirements of Phase II regulations relating to the National Pollutant Discharge Elimination System (NPDES), part of the Clean Water Act (CWA) which are being administered by Utah Division of Water Quality.

Purpose

The Stormwater Management Plan (SWMP) will be implemented to limit, to the maximum extent practicable (MEP), the discharge of pollutants from the Lehi City storm drain system. The development and implementation of the SWMP is to fulfill requirements under the State of Utah UPDES Permit No. UTR090000 Authorization to discharge Municipal Stormwater, Section II, in accordance with Section 402(p)(3)(B) of the Federal Clean Water Act, and the State Stormwater Regulations (UAC R317-8-3.8)

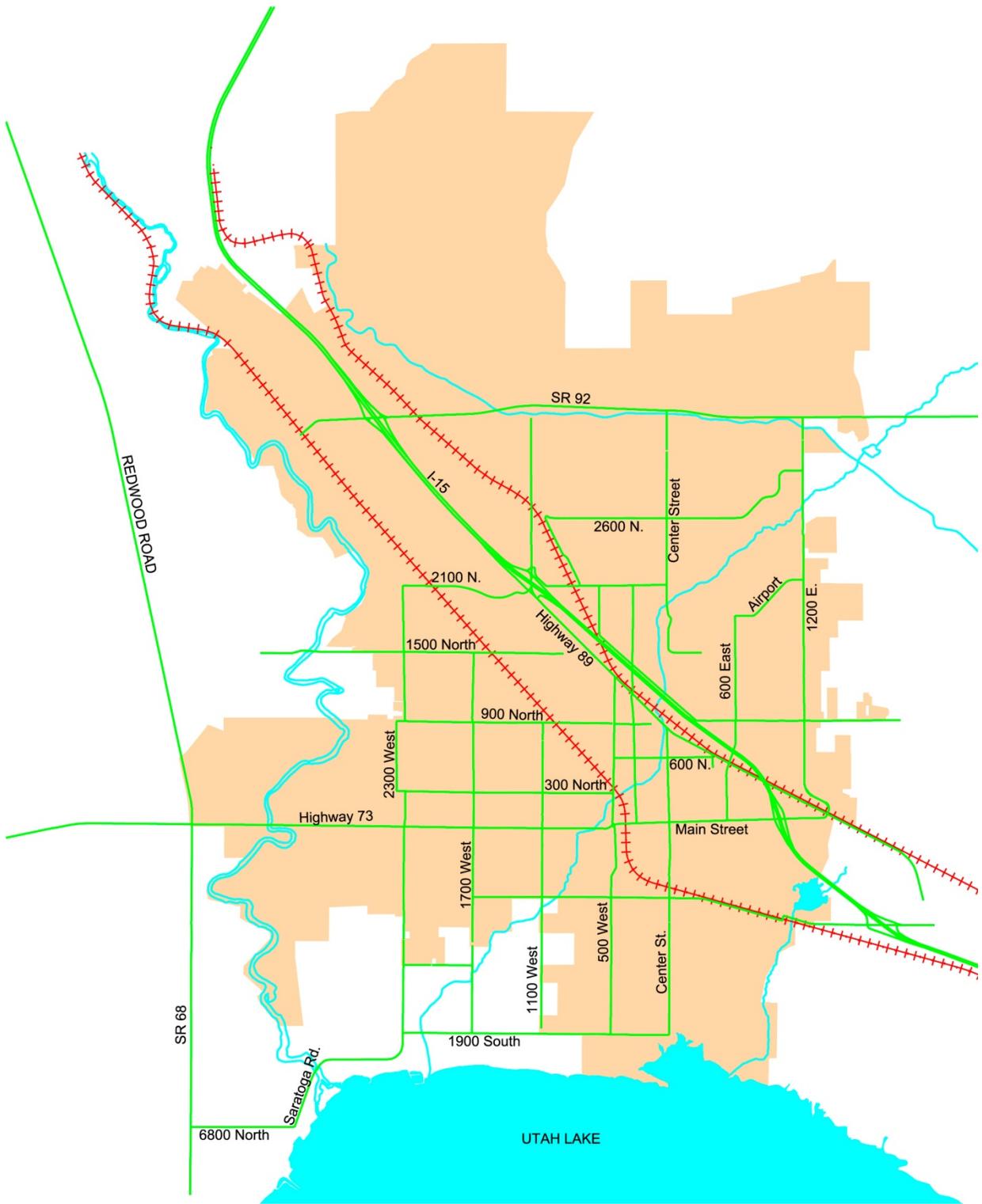
Lehi City

Lehi City is the northernmost community in Utah County covering an area of slightly more than 21 square miles (Figure 1). The City, established in 1852, currently has a population of 49,625 (2010). Originally a farming community, the city is now a commercial and technological center for Utah County and is one of the fastest growing metropolitan areas in the State.

Stormwater Drainage Master Plan

Lehi City completed a comprehensive Stormwater Drainage Master Plan in April 1999. This plan served as an update of the storm drainage master plan completed in 1981 and laid out current guidelines and identified major outfalls (36" and larger) with their expected discharges. As part of the system analysis, an inventory of the existing drainage and irrigation facilities was compiled by interviewing Lehi City employees, researching "As-Built" records, and field observations. The Master Plan identified anticipated runoff concerns as a result of development and roadway improvements (curb and gutter), existing and proposed runoff features (channels and pipes) and irrigation facilities (ditches and canals), and tried to identify any existing illicit discharge points. The Stormwater Drainage Master Plan is scheduled to be updated in 2011.

Figure No. 1 – Lehi City Location Map

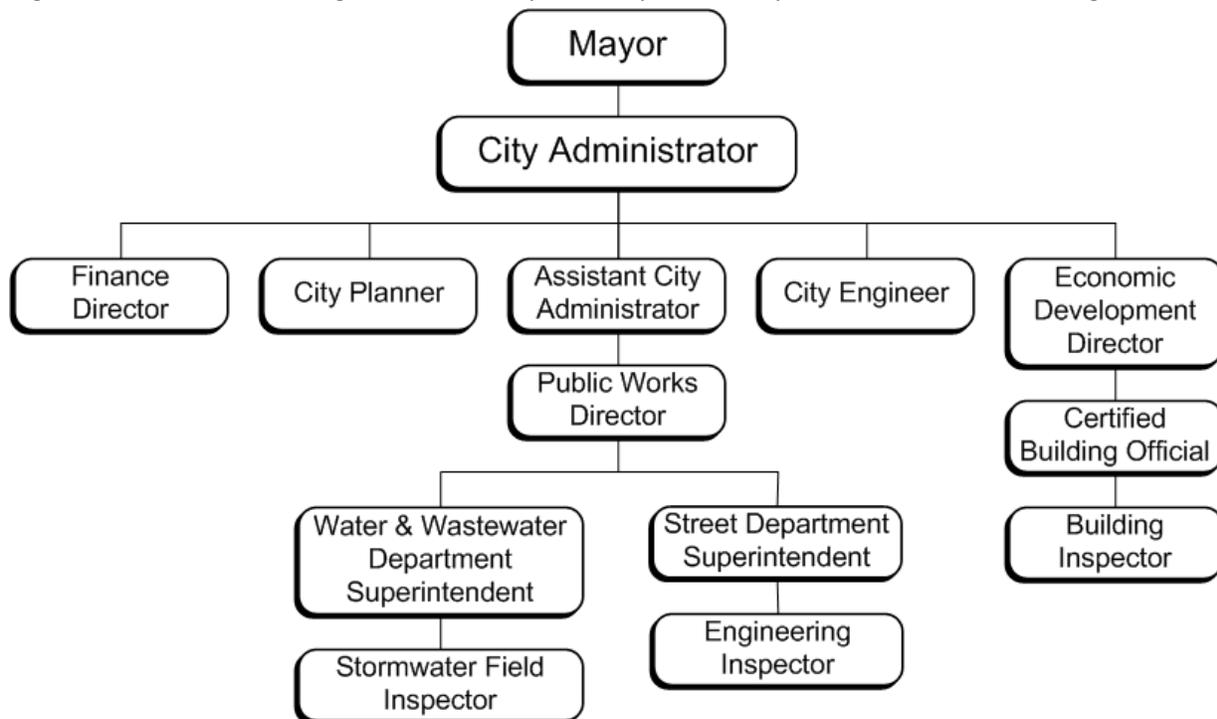


Stormwater Concerns

The City is divided by Interstate-15, the major north/south highway in the State. The drainage flow pattern is from northeast to southwest, draining runoff from the Traverse Mountain Range to Utah Lake. The City has a major drainage feature (Dry Creek) which conveys flows from upstream municipalities and collects flow as it runs through the City. The City also utilizes several other drainage features within the City such as; Cedar Hollow, Fox Ditch, Bull River Ditch and Mill Pond to collect and convey runoff to both the Jordan River and Utah Lake. The existing City drainage system consists of open channels/ditches and storm drain pipe systems.

Plan Management

The City is organized as a strong Mayor form of government. The City Council is responsible for budgeting and policy making decisions. The City Administrator is responsible for the day-to-day operations of the City. The City Administrator has designated the Director of Public Works to oversee the management of the Stormwater Management Plan. The responsibility for implementation of the Plan has been delegated to the Stormwater Utility Field Inspector. The Stormwater Utility Inspector will oversee the efforts of the staff as they implement the specifics of the Plan. The following is an organizational chart showing the lines of responsibility for the implementation of the Management Plan.



Program Funding

In April, 1999 Lehi City adopted a resolution establishing a Stormwater Drainage Utility Fee for the purpose of managing and constructing a stormwater drainage system. Budgets required for the development and implementation of specific drainage related BMPs will be appropriated from this funding source. The City has also adopted a Stormwater Impact Fee which can be used to construct

storm drainage capital projects. The City has also adopted a Stormwater Impact Fee which can be used to construct Storm Drainage Capital Projects.

Minimum Control Measures

The EPA's National Pollutant Discharge Elimination System (NPDES) Phase II Regulations require that Municipal Separate Storm Sewer System (MS4) operators implement a management program that includes six Minimum Control Measures (MCMs). These MCMs are:

- Public Education and Outreach on Stormwater Impacts - efforts to educate the public.
- Public Involvement/Participation - efforts to ensure that the public can help in education, and ensure the public has a say in how the SWMP is implemented.
- Illicit Discharge Detection and Elimination - efforts to eliminate non-stormwater discharges into the storm sewer.
- Construction Site Runoff Control - efforts to minimize the discharge of sediment and other pollutants from construction sites.
- Post-Construction Stormwater Management in New Development and Redevelopment - efforts to ensure that BMPs will function properly after construction is completed.
- Pollution Prevention and Good Housekeeping for Municipal Operations - efforts to minimize pollutants from city operations discharging into the storm sewer.

Lehi City Stormwater Best Management Practice Standard Details

Lehi City has adopted several Stormwater Best Management Practice (BMP) Standard Details acceptable for use within the City. These details can be found at:

<http://www.lehi-ut.gov/planning/designstandards.php>.

Chapter 1: Public Education and Outreach on Stormwater Impacts

Guidance:

The public education program should inform individuals and households about the steps they can take to reduce stormwater pollution, such as ensuring proper septic system maintenance, ensuring the proper use and disposal of landscape and gradient chemicals including fertilizers and pesticides, protecting and restoring riparian vegetation, and properly disposing of used motor oil or house hold hazardous waste. EPA recommends that the program inform individuals and groups how to become involved in local stream restoration activities as well as activities that are coordinated by youth service and conservation corps or other citizen groups. EPA recommends that the public education program be tailored, using a mix of locally appropriate strategies to target specific audiences and communities.

The Public Involvement/Participation Program section of the SWMP addresses the importance of public involvement with respect to protection of stormwater. Community participation provides for broader public support, shorter implementation schedules, a broader base of expertise and the development of important relationships with other community and government programs when drawing upon the residences of the community. The BMPs described in this section of the SWMP includes awareness and opportunities for the public to play an active role in the development and implementation of the BMPs within the SWMP.

Utah County Stormwater Coalition

Lehi City is an active participant in the Utah County Stormwater Coalition both financially and in man-hour support. These activities include (but not limited to) attendance at the regularly scheduled meetings, purchase of educational materials, support of training, and support of past studies (such as the Stormwater Attitude and Awareness Study). The Coalition provides a resource for directional input and dispersment of information and education to Lehi City residents. Lehi City shares in the educational process of educating fourth graders through a Utah County Coalition hired professional educator. In addition, Utah County, through coalition direction, has facilitated an educational stormwater hotline (801-851-7873) to convey information for the disposal of; paints, oils, batteries, anti-freeze, and other household chemicals.

County Fair Participation

Lehi City is an active participant in the Stormwater Educational booth at the County Fair sponsored by the Utah County Stormwater Coalition. For the past several years Lehi City staff has provided staff to occupy the booth providing knowledge and educational material to those interested. Though difficult to measure, this activity helps to educate all county residents.

School Education Program

Lehi City is an active participant in the Utah County Stormwater Coalition's Stormwater Educational Program which educates fourth graders regarding storm water do's and don'ts. The city participates financially to the program which visits annually the following elementary schools within Lehi City. It was

suggested that an informational quiz be offered before and after the presentation to obtain measurable educational improvements.

Snow Springs	Fox Hollow
Challenger	Lehi
Renaissance	Sego Lily
Eagle Crest	North Point
Meadow	Traverse Mountain

Periodic Stormwater Educational Articles

Lehi City residents are educated periodically with specific stormwater informational/educational articles in the monthly billing. These articles include fact sheets or information and/or educational brochures.

Staff Training

As part of the education process, Lehi City offers training to city employees involved with the operation of the facilities regarding water quality impacts associated with illicit discharges and improper disposal of waste. Training topics to include (but not limited to) equipment inspection to ensure timely maintenance; property management and disposal of wastes; proper management of dumpsters; minimization and use of salt and other de-icing materials; benefits of appropriate on-site infiltration; and proper maintenance of parking lot surfaces.

Additional training to development and plan review staff, land use planners regarding Low Impact Development (LID) practices and green infrastructure practices will detail specific requirements for construction and post-construction control and the associated BMPs.

GOALS

<i>Year</i>	<i>Implementation</i>	<i>Assessment</i>	<i>Measurable</i>
Each Year	Elementary School Education	Instruct Identified Elementary Schools	Show increase awareness before and after through quizzes
2011	Participation in County-Wide Survey	General Knowledge Assessment	Statistically valid Survey
Each Year	Program Assessment	Program Status for Meeting Goals	Rate Progress
2012 2014	Staff Training	Scheduled every other year	Document through agenda and attendance records

Chapter 2: Public Involvement/Participation

Guidance:

EPA recommends that the public be included in developing, implementing, and reviewing the stormwater management program and that the public participation process should make efforts to reach out and engage all economic and ethnic groups. Opportunities for members of the public to participate in program development and implementation include serving as citizen representatives on a local stormwater management panel, attending public hearings, working as citizen volunteers to educate other individuals about the program, assisting in program coordination with other pre-existing programs, or participating in volunteer monitoring efforts.

The Stormwater Management Program can be greatly improved by involving the community through the entire process of developing and implementation of the program.

Public Notices

Lehi City will provide members of the community opportunities to participate by adding input and comments on storm drainage related documents and issues identified by the BMPs in the SWMP. Notification to the residences in the community will comply with all state and local public notice requirements.

Spring Clean-up

Lehi City has several drainage channels providing conveyance for runoff throughout the community. The largest drainage channel is Dry Creek. Dry Creek flows are received from Highland, just to the east of Lehi City and discharge downstream into Utah Lake. It is imperative that all drainage features remain clear of garbage, weeds and debris. Monitoring these facilities for scour and sedimentation throughout the conveyance system is also critical. The city provides one week in the spring each year dedicated for the clean-up of all major drainage channels. This Stream Clean-up Program will include the solicitation of concerned citizens and community members to provide volunteer efforts to remove any large or small debris within the channel and notify the City of any visual concerns within the channel system. The City designates one week, typically in the spring, for this volunteer work to be accomplished. Notification is given to all residents in the prior monthly utility newsletter. A contact phone number will be provided for the reporting of any concerns within the drainage channels.

Public Reporting

Public reporting can provide important assistance in preventing stormwater pollution by offering a greater visibility of violation areas such as; yard cleanup, construction activities, illicit discharges, inappropriate stock piling of materials in the street, tracking, etc. The City has designated the Water Department's main office phone number for reporting all concerns and violations: 801-768-7102 ext 3.

GOALS

Year	Implementation	Assessment	Measurable
As Req'd	Follow Public Notice Requirements	Documentation of Public Notices Issued	Document process and community response through participation
Each Year	Annual Spring Clean-up Activities	Yard and Stream debris clean-up	Quantity Change per year in weight of waste material
2012	Public Input	Establish citizen advisory group or add storm drain discussions to other established committees	Track the number of public calls and volunteer hours
Each Year	Public Reporting	Documentation of Reporting Calls	Track the number of calls/emails/letters received

Chapter 3: Illicit Discharge Detection and Elimination

Guidance:

EPA recommends that the plan to detect and address illicit discharges include the following four components:

- *Procedures for locating priority areas likely to have illicit discharges*
- *Procedures for tracking the source of an illicit discharge*
- *Procedures for removing the source of the discharge*
- *Procedures for program evaluation and assessment*

EPA recommends visually screening outfalls during dry weather and conducting field tests of selected pollutants as part of the procedures for locating priority areas. Illicit discharge education actions may include storm drain stenciling, programs to promote, publicize, and facilitate public reporting of illicit connections or discharges, and distribution of outreach materials.

An illicit discharge is defined as any discharge to the municipal separate storm sewer system that is not composed entirely of stormwater. These non-stormwater discharges occur due to illegal connections to the storm drain system from business or commercial establishments. The Illicit Discharge and Elimination section of the SWMP addresses non-stormwater flows that are discharges to receiving waters via stormwater conveyance systems. The program implements BMPs to assist in the identification of illicit discharges and removal of these discharges from the system. This program will also focus on the prevention of new illicit discharges to the stormwater system by means of education, regulations, and spill prevention and response.

This program will also be integrated with the Public Education and Outreach Program to promote awareness of the importance of protecting the stormwater system from illicit discharge and the resultant impact to receiving waters.

System Mapping

Runoff throughout the City is predominately in a southwest direction. Most of the flow eventually drains either west to Jordan River or south to Utah Lake. The City drainage system utilizes both drainage features as well as irrigation systems during major runoff events. The City maintains current storm drain mapping in order to provide for storm runoff and also help determine the source and extent of dry weather flows, and the particular water bodies these flows may be affecting. The City also maintains current irrigation mapping in order to determine the source and extent of non-irrigation flows, and the particular receiving water bodies these flows may be affecting. These maps will be updated as necessary (at minimum every 5 years). For runoff systems which drain to irrigation facilities, an estimate of the capacity of the irrigation system will be determined to approximate the excess flow for stormwater beyond the basic irrigation water rights. If an irrigation ditch accepts storm runoff but is to be abandoned, the City will evaluate the need to secure an easement or right-of-way for maintaining its use for stormwater purposes. Other mapping such as City land use maps will be utilized for tracing dry weather flows and for computing the expected annual stormwater loads.

Dry Weather Field Screening

The Dry Weather Screening Program consists of inspecting the major and minor outfalls that are governed by the City. The Dry Weather Screening Program provides a framework for field screening the outfalls to identify suspect outfalls as a basis for initiating more detailed drainage area investigations. Areas likely to have illicit discharges will be prioritized and routinely inspected. All areas will be inspected over the period of the permit. In addition, the storm drain system maps will be updated as necessary to add and delete outfalls to reflect field conditions as appropriate. All activities conducted under the Dry Weather Screening Program will be documented. Any dry weather flows that are identified are traced to their source. The County Health Department will be notified of significant violations to consider any additional enforcement actions. Investigations or enforcement actions will be documented.

Public Reporting Mechanism

(Refer to Public Involvement / Participation Section)

Part of the city's previous success in detecting illicit discharges is through the help of their residence. As awareness within the public increases, the city expects more help from its citizens. The city offers several means of conveying this information to the necessary city representatives such as phone, website and mailers. Contact methods will be maintained and promoted during the permit period.

Training

Lehi City will provide training to field staff who may come into contact or observe illicit discharges, on the identification and proper procedures for reporting and addressing illicit discharges

GOALS

<i>Year</i>	<i>Implementation</i>	<i>Assessment</i>	<i>Measurable</i>
As Req'd	Current storm drain and irrigation mapping	Update as necessary	Update every 5 years (minimum)
2011	Dry Weather Screening Program	Develop and follow Standard Operating Procedures	Inspect at least 20% of the priority areas each year
2012 2014	Illicit Discharge education and Training	Schedule every other year	Document attendance
2012	Identify source area and Site Prioritization	Identify issue ("hotspot") areas	Develop List with schedule for inspection
2012	Develop a spill/dumping Response procedure	Written Standard Operation Procedure	Written procedure with flow chart

Chapter 4: Construction Site Stormwater Runoff Control

Guidance:

EPA recommends that procedures for site plan review include the review of individual pre-construction site plans to ensure consistency with local sediment and erosion control requirements. Procedures for site inspections and enforcement of control measures could include steps to identify priority sites for inspection and enforcement based on the nature of the construction activity, topography, and the characteristics of soils and receiving water quality. Appropriate educational and training measures for construction site operators is encouraged.

Polluted stormwater runoff from construction sites often flow to storm drains and into receiving waters that can be deposited naturally during several decades. The resulting siltation can cause physical, chemical and biological harm to receiving waters. The BMPs described in this section of the SWMP includes the development of a construction site program designed to reduce pollutants in stormwater runoff from construction activities. This program will include procedures for construction site plan review, site inspections, public reporting, contractor education and notification of permit requirements to all construction site owners/operators. BMPs include: temporary on-site basins, check dams, energy dissipaters, silt fencing, channel linings, etc.

Site Plan and Subdivision Review

All Site and Subdivision Plans are required to be review and approved by the City Development Review Committee (DRC). The review considers the potential short and long-term water quality impacts and minimizes these impacts, to the MEP. The review also considers requirements for operators to control other wastes such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste that may adversely impact water quality. Plan submission includes the development of a Stormwater Pollution prevention Plan (SWPPP) for all construction sites that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development.

Land Disturbance Permit

Lehi City will adopt and enforce the use of a Land Disturbance Permit for disturbed areas larger than one acre. The form will have associated fees and address requirement needs.

Contractor Education

The City makes available appropriate education and training material to construction site operators for minimizing stormwater pollution during construction activities. These include:

- “A Stormwater Management for Construction Activities: Developing Pollution Prevention Plans and Best Management Practices” - EPA
- “Construction Stormwater Fact Sheet” - DWQ
- Utah County Guidelines for Construction Site BMPs
- Lehi City Design Standards.

Also, information and references for owners, designers and contractors to utilize in the planning and implementation of structural and non-structural BMPs to reduce pollutants discharged to the storm drain system during construction will be provided.

Site Inspection

Monthly construction site inspections will be conducted at all active sites that disturb one acre or more or are part of a common plan of development or sale. Biweekly inspections of priority construction sites will also be completed. Violations will be documented and procedures enforced for noncompliance of erosion control measures. Inspection sites will be prioritized for inspection and enforcement based on the nature and extent of the construction activity and the nature of the site, topography, soil characteristics, and receiving water quality. Inspections will ensure that BMPs are properly installed, maintained, and are reducing pollutants in stormwater runoff from construction activities, to the MEP. The Division's Construction Stormwater Inspection Form (Checklist) (<http://www.waterquality.utah.gov/UPDES/stormwatercon.htm>) will be used for construction site inspections. Follow-up actions may be required to re-inspect or enforce no-action findings from the original inspection.

Training

City staff specifically assigned to storm drain inspection and enforcement will be trained in the fundamentals of erosion prevention and sediment control and in how to review Stormwater Pollution Prevention Plans (SWPPPs).

GOALS

<i>Year</i>	<i>Implementation</i>	<i>Assessment</i>	<i>Measurable</i>
Each Year	Site and Subdivision Review	Review all site and Subdivision Plans	No. of Document Plan Reviews
2011	Land Disturbance Permit	Adopt Land Disturbance Permit	Develop
2012 2014	Training available to staff and contractors	Facilitate Training every other year	Documentation of Attendees
Each Year	Inspection	Monthly Inspection of all Active sites	Document - Form

Chapter 5: Post-Construction or Permanent/Long-Term Stormwater Control Measures

Guidance:

EPA recommends that the city adopt a planning process that identifies the municipality's program goals, implement strategies, operate and maintain policies and procedures, and enforce procedures. If water quality impacts are considered from the beginning stages of a project, new development and potentially redevelopment provide more opportunities for water quality protection. Program development should consider assessing existing ordinances, policies, programs and studies that address stormwater runoff quality. EPA recommends that BMPs be chosen that are appropriate for the local community; minimize water quality impacts; and attempt to maintain pre-development runoff conditions.

Non-structural BMPs are preventative actions that involve management and source controls such as; policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space, provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; policies or ordinances that encourage infill development in higher density urban areas, and areas with existing infrastructure; education programs for developers and the public about project designs that minimize water quality impacts; and measures such as minimization of percent impervious areas after development and minimization of directly connected impervious areas.

Structural BMPs include: storage practices such as wet ponds and extended-detention outlet structures; filtration practices such as grassed swales, sand filters and filter strips; and infiltration practices such as infiltration basins and infiltration trenches. EPA recommends that to ensure the appropriate implementation of the structural BMPs the City consider some or all of the following: pre-construction review of BMP designs; inspections during construction to verify BMPs are built as designed; post-construction inspection and maintenance of BMPs; and penalty provisions for the noncompliance with design, construction or operation and maintenance.

The type and quantity of pollutants in stormwater runoff typically increases following new development and redevelopment projects. As runoff flows over newly disturbed areas it picks up harmful sediment and chemicals from the unprotected surface and conveys it to receiving waters. Minimization of impervious areas, maintenance or restoration of natural infiltration, wetland protection, use of vegetated drainage ways, and use of riparian buffers have been shown to reduce pollutant loadings in stormwater runoff from developed areas. By controlling development and preserving open space, the quantity of the impervious surface is minimized which has an effect of reducing both the quantity and quality of the runoff. The open space also allows for the protection of sensitive areas such as wetlands and riparian areas.

The Post-Construction Stormwater Management in New Development and Redevelopment Program addresses stormwater runoff from new development and redevelopment projects that disturb greater than, or equal to, one acre. The program ensures that controls are in place that will protect water quality and reduce the discharge of pollutants to the maximum extent practicable. The BMPs described in this section of the SWMP include the development of structural and non-structural stormwater runoff strategies.

This program will be integrated with the Construction Site Stormwater Runoff Control Program of the SWMP to ensure adequate long-term operation and maintenance of the BMPs. The following BMPs describe implementation tasks and assessment tasks to be completed by Lehi City for the Post-Construction Stormwater Management in New Development and Redevelopment.

Post-Construction Maintenance and Retrofitting Existing Development

Develop procedures ensure adequate long-term operation and maintenance of stormwater controls at post-construction sites. Proper operation and maintenance of the control measures help to minimize pollutants in stormwater runoff. Improper maintenance or failure of stormwater controls following construction lead to adverse impacts on stormwater quality. Established procedures ensure adequate long-term operation and maintenance of stormwater controls is imperative in reducing stormwater pollution. The plan will include retrofitting existing features that adversely impact water quality.

Inventory

An inventory will be established of all post-construction structural stormwater controls measures (public and private) installed and implemented at new development and redeveloped sites that disturb greater than or equal to one acre including projects less than one acre that are part of a larger common plan of development.

Inspection & Enforcement

Structural BMPs will be inspected at least once during installation, inspected annually and maintained as necessary.

Training

The city will provide adequate training of all staff involved in Permitting, planning, and review as required.

GOALS

<i>Year</i>	<i>Implementation</i>	<i>Assessment</i>	<i>Measurable</i>
Each Year	Inventory	Develop site Inventory	Document and update annually
As Req'd	Retrofit existing controls	Retrofit existing post-construction structure controls	Log Location and Activities
Each Year	Inspection	Verify and ensure proper maintenance of structural BMPs at least once during the permit term	Inspect 20% each year
2012 2014	Training	Facilitate training every other year	Document training sessions and attendance

Chapter 6: Pollution Prevention and Good Housekeeping for Municipal Operations

Guidance:

EPA recommends that, at a minimum, the City consider the following in developing their program: maintenance activities, maintenance schedules, and long-term inspection procedures for structural and non-structural stormwater controls to reduce floatables and other pollutants discharged from your separate storm sewer; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations and snow disposal areas operated by you, and waste transfer stations; procedures for properly disposing of waste removed from the separate storm sewers and areas listed above; and ways to ensure that new flood management projects assess the impacts on water quality and examine existing projects for incorporating additional water quality protection devices or practices. Operation and maintenance should be an integral component of all stormwater management programs. This measure is intended to improve the efficiency of these programs and require new programs where necessary. Properly developed and implemented operation and maintenance programs reduce the risk of water quality problems.

Lehi City will develop and implement an Operations and Maintenance (O&M) program for City owned and operated facilities that have the ultimate goal of preventing or reducing pollutant runoff.

Municipal Industrial Facilities

The city will maintain and control all industrial facilities owned by Lehi City Corporation which are subject to the State's UPDES Multi-Sector General Permit for discharges of stormwater associated with industrial activity which ultimately discharge to the MS4. Proper management of these facilities will prevent migration of concentrated suspended material to storm drain systems. Lehi City will inventory and maintain all City owned facilities including; public buildings, swimming pools, landfills, material storage yards, salt pile storage, transfer locations, gasoline tanks, and maintenance equipment sites. The facilities will be prioritized for operations that have a high potential to generate stormwater pollutants. Facility Inspections will include: weekly visual inspections of all facilities, quarterly comprehensive inspections of "high priority" facilities, and quarterly visual observation of stormwater discharges from the "high priority" facilities.

Training

Lehi City will train all employees whose primary construction, operation, or maintenance job functions are likely to impact stormwater quality. Training will address the importance of protecting water quality, the requirements of this Permit, operation and maintenance requirements, inspection procedures, ways to perform their job activities to prevent or minimize impacts to water quality, SOPs for the various City owned and operated facilities and procedures for reporting water quality concerns, including potential illicit discharges.

GOALS

Year	Implementation	Assessment	Measurable
Each Year	Stormwater Control BMP inspection	Inspection of BMPs	Document Annual Inspection
Each Year	System Facility Maintenance and Inspection	Develop Schedule	Meet Schedule
2011	Inventory Municipal Industrial Facilities	Inventory Facilities	Develop Inventory List
2012 2014	Training	Personnel training regarding water quality and pollutants every other year	Document Training and Attendance

Chapter 7: Evaluation and Reporting

Guidance:

EPA requires MS4 to evaluate program compliance, the appropriateness of identified control measures, and progress toward achieving identified measurable goals.

Tracking System Development

Within the first two years of the permit, Lehi City will develop a tracking system to track the information required in the permit as well as the information required to be reported in the annual report.

Evaluation

Annually, during the preparation of the annual report, the city will assess the effectiveness of the established program and make revisions as necessary to maintain implementation and compliance with the permit goals. The annual effectiveness assessment will include the following:

- Assess compliance with the permit;
- Measure the effectiveness of the city's stormwater management program as a whole;
- Characterize stormwater discharges
- Identify sources of specific pollutants
- Detect and eliminate illicit discharges and illegal connections to the stormwater system
- Assess the overall health and evaluate long-term trends in receiving water quality.

Reporting

A key requirement in the stormwater Phase II rule is a report that includes "the status of compliance with permit conditions, an assessment of the appropriateness of identified control measures and progress towards achieving identified measurable goals for each of the minimum control measures."

This Report will include:

- The status of compliance with permit conditions, an assessment of the appropriateness of the identified best management practices and progress towards achieving the identified measurable goals for each of the minimum control measures;
- Results of information collected and analyzed, including monitoring data, if any, during the reporting period;
- A summary of the stormwater activities to be undertake during the next reporting cycle;
- A change in any identified best management practices or measurable goals for any of the minimum control measures.

GOALS

Year	Implementation	Assessment	Measurable
2012	Develop Record & Tracking System	Procedure and database established	Established process
Each Year	Annual Assessment	Assess Progress and Deficiencies	Quarterly meeting with key staff discussing report specifics
Each Year	Annual Reporting	Develop annual report and submit to State	Submittal to State by October 1 st