

## Appendix B: City of Omaha - Storm Water Management Plan

Measurable goals listed in the Storm Water Management Plan are target goals on which progress will be reported on in the annual report.

<b>A. Public Education and Outreach</b>		
<b>BMP #</b>	<b>SWMP Element Description</b>	<b>Target Goals &amp; Implementation Schedule</b>
1, 3, & 4.	Develop a plan for outreach that defines the goals, objectives, target audience and distribution process of materials for the public education and outreach program.	<b>Year 1</b> – Develop a 5-year education and outreach plan. Submit the plan to NDEQ with the Annual Report. <b>Years 2-5</b> – Review and update the plan each permit year and include the revised plan in the Annual Report.
2.	Maintain and update appropriate messages for targeted residential, construction, and commercial issues.	<b>Year 1</b> – Inventory current outreach materials in each of these targeted areas and develop new materials as needed. <b>Years 2-5</b> – Provide copies of new outreach materials in the annual report.

<b>B. Public Participation and Involvement</b>		
<b>BMP #</b>	<b>SWMP Element Description</b>	<b>Target Goals &amp; Implementation Schedule</b>
1.	Provide opportunities for citizens to comment on new rules, ordinances, and regulations regarding the MS4.	<b>On-Going All Years</b> – Post on the City Stormwater Website proposed changes to rules, ordinances, and regulations. Provide information in the annual report on approved changes and input received from the public.
2.	Create opportunities for citizens to participate in the implementation of stormwater controls.	<b>On-Going All Years</b> – Post on the City Stormwater Website opportunities for public involvement in stormwater control related activities.
3.	Provide access to information about the City's SWMP.	<b>On-Going All Years</b> – Maintain current City SWMP and MS4 annual reports on the Omaha Stormwater website.

**C. Illicit Discharge Detection and Elimination**

BMP #	SWMP Element Description	Target Goals & Implementation Schedule
1. a	Maintain a compliance plan or mechanism to follow up on illicit discharges.	<b>On-Going All Years</b> – Maintain the compliance procedures per the permit requirements.
1. b	Maintain a map showing all known MS4 outfalls and the location of all state-designated waters receiving direct discharges from MS4 outfalls.	<b>On-Going All Years</b> – Maintain a continually updated storm sewer system map per the permit requirements.
1. c	Conduct field screening activities per the permit requirements (set forth in 40 CFR Part 122.26(d)(1)(iv)(D)) specifically geared to local TMDL pollutants of concern such as <i>E. Coli</i> and to eliminate illicit discharges,	<b>Year 1</b> – Develop dry weather screening, sampling, and quality control plan to address pollutants of concern. Conduct screening under current plan during Year 1. <b>On-Going All Years</b> – Annually conduct dry weather monitoring according to screening and sampling plan.
1. d	Implement procedures to investigate and trace sources of identified illicit discharges to the MS4.	<b>On-Going All Years</b> – Document investigations include date observed, result of investigation(s) and date closed.
1. e	Implement procedures to remove illicit discharges to the MS4. Document all interactions with potentially responsible parties.	<b>On-Going All Years</b> – Use the code enforcement procedures to eliminate unauthorized non-stormwater discharges identified during an investigation
1. f	Identify and address allowable non-stormwater discharges determined to be significant contributors to pollutants. Identify any additional non-stormwater discharges that will not be addressed as illicit discharges.	<b>On-Going All Years</b> – Report on any local controls or conditions placed upon exempt non-stormwater discharges and additional identified exempted non-stormwater discharges.
2 & 3.	Coordinate with adjacent permitted MS4s to report illicit discharges to the appropriate authority having jurisdiction and respond to reports from other MS4s.	<b>Year 1</b> – Develop procedures for coordination with adjacent permitted MS4's. <b>On-Going All Years</b> – Include in the annual report any known illicit discharge reports to and from adjacent MS4s.
4.	Maintain written procedures for the IDDE component of the MS4 permit.	<b>On-Going All Years</b> – Make available upon request the standard operating procedures developed under this program component.
5.	Receive reports and complaints, internally and from the public, of illicit discharges and illegal dumping into the MS4. Respond to and investigate complaints about spills, dumping, or disposal of materials other than stormwater to the MS4.	<b>On-Going All Years</b> – Coordinate with others in the City to resolve complaints. Develop a system to generate reports and track the number of calls per year in regard to spills, dumping or improper disposal of material to the MS4. Include a count of complaints received and investigations completed in the annual report.
6.	Develop, implement and maintain a training program for municipal field staff with respect to IDDE.	<b>Year 1</b> – Develop a strategy which identifies field staff and appropriate levels of training. <b>Years 2 - 5</b> – Provide a count of employees which have received training in the annual report.

**D. Construction Site Runoff Control**

<b>BMP #</b>	<b>SWMP Element Description</b>	<b>Target Goals &amp; Implementation Schedule</b>
1.	Maintain the established program requiring operators of public or private construction activities to comply with local erosion and sediment control requirements.	<b>On-Going All Years</b> – Include any updates to City Code or Permit requirements in the annual report.
2.	Maintain a compliance plan or mechanism to follow up on construction site non-compliance.	<b>On-Going All Years</b> – Maintain the compliance procedures per the permit requirements.
3.	Review grading permit applications and maintain a continually updated inventory of all private and public construction sites.	<b>On-Going All Years</b> – Include in the annual report the number and type of grading permits reviewed.
4.	Maintain the electronic records for inspection of construction sites and enforcement of erosion and sediment control measures.	<b>Year 1</b> – Develop a strategy for site inspections by municipal staff, and include in the annual report. <b>On-Going All Years</b> – Inspect construction sites on a regular basis and on a complaint basis. Track the number of sites inspected annually in a database. Initiate enforcement proceedings as appropriate to address violations. Include a summary of inspections completed and enforcement actions taken in the annual report.
5.	Provide training for municipal staff with respect to their assigned duties as it relates to sediment and erosion control from construction activity. One formal training course for inspection staff during their employment with the City and internal training on an as needed basis to maintain consistent reporting among all inspectors.	<b>On-Going All Years</b> – Include in the annual report the number of staff and their sediment and erosion control training completed.
6.	Communicate with the regulated community and other groups affected by the Construction Site Runoff program and provide a mechanism to receive complaints from the public.	<b>On-Going All Years</b> – Conduct workshops for developers, builders, site designers, contractors, and/or City staff as determined necessary (i.e., a rule or regulation is changed). Track reports from the public regarding construction sites. Include the number of reports received in the annual report and the permittees response.

**E. Post Construction Runoff Control**

<b>BMP #</b>	<b>SWMP Element Description</b>	<b>Measurable Commitments &amp; Implementation Schedule</b>
1.	Continue to implement the Post Construction Program as stipulated in the OMC. Periodically update guidance material and develop divergent standards for difficult sites such as linear projects. Update as needed the Omaha Regional Stormwater Design Manual (ORSDM).	<b>Year 1</b> – Develop divergent standards for guidance document and update guidance as needed. Submit standards with the annual report. <b>On-going All Years</b> – Revise as necessary. Include a summary of revisions in the annual report.
2.	Review and update, if needed, the standards outlined in the OMC and ORSDM for consistency with required performance standards as they relate to post-construction stormwater management plans.	<b>On-going All Years</b> – Report on any updates to the OMC or ORSDM.
3.	Maintain an online submittal and review process for site plans, easement and maintenance agreements, as built drawings, deed recordings and drainage studies.	<b>On-going All Years</b> – Report number of PCSMP projects and the status of their progress in the annual report.
4.	Develop SOP's for responding to complaints regarding Post Construction BMPs and a strategy for verifying BMPs are being installed & maintained in perpetuity.	<b>Year 1</b> – Submit SOP's with the annual report. <b>On-going All Years</b> – Report on any complaints and/or BMP's which have been certified as complete.
5.	Maintain a database that stores information on approved PCSMPs.	<b>On-going All Years</b> – Provide an inventory of certified stormwater control measures installed as part of the PCSMP requirements. Include a count of BMP types as well as any known changes to BMPs in the annual report.
6.	Inspect sites that are certified by the engineer of record and all sites identified as deficient on a complaint basis. Develop a protocol to bring sites in to compliance.	<b>Year 1</b> – Develop protocol for compliance assistance, and inspection strategy <b>On-going All Years</b> – Document and maintain inspection records of the certified PCSMP projects as identified in the strategy developed. Document any enforcement actions taken. Summarize activities in annual report.

**F. Pollution Prevention and Good Housekeeping**

<b>BMP #</b>	<b>SWMP Element Description</b>	<b>Target Goals &amp; Implementation Schedule</b>
1.	Maintain an inventory and map of municipal facilities. Review annually and update if needed.	<b>On-Going All Years</b> – Maintain an inventory and map of all municipal facilities.
2.	Conduct assessments of municipal maintenance facilities and review their municipal runoff control plans as applicable. Revise plans as needed if facilities expand or reduce activities and implement recommendations based on annual inspections.	<b>Year 1</b> – Develop a strategy to assess municipal facilities and prioritize them based upon a defined set of criteria, include strategy in the annual report. <b>Years 2 - 5</b> – Track the number of assessments for municipal facilities based upon the strategy developed in year 1. Include the number of assessments completed, a description of the assessment procedure and any changes in facilities ranking in the annual report.
3.	Continue to implement Omaha’s Good Housekeeping Program for municipal facilities that addresses “high-priority” facilities (hot spot score of 20-30 out of 30) and site specific SOPs.	<b>On-Going All Years</b> – Annually report new, removed, or significantly updated municipal facilities
4.	Implement practices for maintaining the storm sewer system that includes catch basin maintenance, open channels and other drainage structures, street sweeping, and structural stormwater controls. All maintenance procedures are to be performed such that waste water and waste materials do not enter the MS4.	<b>Year 1</b> – Provide a description of the maintenance programs in the annual report. <b>On-Going All Years</b> – Annually report on Sewer Maintenance activities related to maintaining the storm sewer system and changes to any of the maintenance practices.
5.	Provide training for municipal employees in pollution prevention and good housekeeping.	<b>Year 1</b> – Develop a strategy for municipal employee training in pollution prevention and good housekeeping, include strategy in annual report. <b>On-Going All Years</b> – Conduct training events for municipal staff include number of employees trained, based on strategy developed in year 1, in annual report.
6.	Provide educational material to contractors hired to perform maintenance activities on the MS4.	<b>Year 1</b> – Develop materials to provide to contractors and include in the annual report. <b>Years 2 - 5</b> – Include in the annual report any new materials or updates to existing materials.

**G. Industrial and Related Facilities**

<b>BMP #</b>	<b>SWMP Element Description</b>	<b>Target Goals &amp; Implementation Schedule</b>
1.	Maintain a program that identifies industries within the MS4 area which fall into sectors identified in the ISW- NPDES permit.	<b>Year 1</b> – Develop strategy that will identify industries and their compliance with NPDES permits. <b>On-going All Years</b> – Review and update strategy developed in year on and report on any changes in the annual report.
2.	Request a list of permitted facilities and the NOI from NDEQ in January of each permit year.	<b>On-going All Years</b> – Maintain a database to track NPDES permitted facilities.
3.	Inform industries about the NPDES ISW Permit and notify the state when industries are not in compliance with the state regulations.	<b>On-going All Years</b> – Develop industry specific publications regarding the NPDES regulations and distribute to inspected facilities.
4.	Inspect NPDES permitted industries from a list provided by NDEQ in January of each year. Maintain a tracking system for inspections and SWPPP reviews. Review the SWPPP or NEC prior to completing an inspection.	<b>On-going All Years</b> – Inspect 20% of the facilities on the list provided by NDEQ each year so that all industries are inspected once in the permit cycle.
5.	Ensure inspectors completing industrial stormwater inspections are competent.	<b>On-going All Years</b> – Report inspection activities in the annual report.

### H. Monitoring Program

BMP #	SWMP Element Description	Measurable Commitments & Implementation Schedule
1.	Dry Weather Screening	<p><b>On-going All Years</b> – Implement a dry weather screening of priority outfalls for IDDE following screening and sampling plan. Keep a record of outfalls observed and a record of the field screening results. Follow strategy in SWMP Program Component C - IDDE for outfalls showing presence of an illicit discharge. Update priority list based on observations.</p>
2.	<p>Develop a wet weather BMP assessment monitoring plan for demonstration BMPs to facilitate future SWMP planning. Evaluate the effectiveness of the selected BMPs. BMP assessment may include flow based monitoring, or water quality sampling. Biological systems may include plant assessments and visual observations.</p> <p>Construct structural BMPs and implement non-structural BMPs to evaluate the effectiveness of their ability to address pollutants of concern. Include in the BMP assessment program if appropriate.</p>	<p><b>Year 1</b> – Revise the BMP assessment monitoring plan and submit to NDEQ for approval. Amend as necessary when new demonstration projects have been constructed.</p> <p><b>On-going All Years</b> – Implement monitoring plan in demonstration projects. Report findings in the Annual Report.</p> <p>The following information shall be included in the Annual Activity Report:</p> <ol style="list-style-type: none"> <li>1) the location of the monitoring site</li> <li>2) the intensity and duration of the storm event monitored;</li> <li>3) the timing of sampling in comparison to the occurrence of the storm event and to the discharge of peak storm water flows;</li> <li>4) the monitoring data; and a summary of the findings.</li> </ol>
3.	Utilize data collected by others to help assess the effectiveness of BMPs.	<p><b>On-going All Years</b> – Gather data from others and include in the annual report with a summary of findings.</p>