# GSWMD MCM-4: Construction Site Storm Water Runoff Control

#### 1. DESCRIPTION OF PROGRAM

Polluted storm water runoff from construction sites often flows to an MS4 entity and ultimately discharges into local rivers and streams. Sediment, solid wastes, and sanitary wastes, phosphorous (fertilizer), nitrogen (fertilizer), pesticides, oil and grease, concrete truck washout, construction chemicals and construction debris are pollutants of concern. Of those pollutants, sediment is the main pollutant of concern in construction site run-off. Sediment runoff rates from construction sites are typically 10 to 20 times greater than those of agricultural lands, and 1,000 to 2,000 times greater than those of forested lands. Over a short period, construction sites can contribute more sediment to streams than can be deposited naturally over several decades. The resulting siltation, and the contribution of other pollutants from construction sites, can cause physical, chemical, and biological harm to the receiving waters in the GSWMD.

The GSWMD recognizes the adverse effects construction site storm water runoff can have on the receiving waters in Gary and plans to develop, implement, and enforce a construction site storm water runoff program, which includes the following:

- 1. Passes an ordinance that requires the implementation of proper erosion and sediment controls, and controls for other wastes on applicable construction sites;
- 2. Creates procedures for site plan review of construction plans that consider potential water quality impacts;
- 3. Has procedures for site inspection and enforcement of control measures;
- 4. Establishes procedures for the receipt and consideration of information submitted by the public; and
- 5. Determines the appropriate best management practices (BMPs) and measurable goals for this minimum control measure.

#### 1.1 Structural and Non-Structural BMPs

The GSWMD has created a list of pre-approved structural and non-structural BMPs permitted in the GSWMD. This dynamic standards list will provide an opportunity and standards to review new technologies as they become available.

The City of Gary Stormwater Management Ordinance discusses BMP technical standards in Chapter 5, Sections 2 and 3, Page 21. The City of Gary Stormwater Technical Standards Manual provides a list of construction site BMPs in Chapter 7, Table 7-1, Page 3; provides method for approving new BMPs in Chapter 8, Section B, Page 1; provides list of pre-approved post-construction BMPs in Chapter 8, Section C and Table 8-1, Pages 1-3; covers construction BMPs in Appendix C; and covers post-construction BMPs in Appendix D.

The GSWMD has created the City of Gary Stormwater Technical Standards Manual in coordination with Lake County. BMPs not previously accepted by the City of GSWMD and/or Gary City Engineer and/or Gary Public Works Commissioner, must be certified by a professional engineer licensed in State of Indiana and the BMP accepted through the GSWMD and/or Gary City Engineer and/or Gary Public Works Commissioner. ASTM standard methods must be followed when verifying performance of new measures. New BMPs, individually or in combination, must meet the 80% TSS removal rate at 50-125 micron range (silt/fine sand) without re-entrainment and must have a low to medium maintenance requirement to be considered by the GSWMD and/or Gary City Engineer and/or Gary Public Works Commissioner. Testing to establish the TSS removal rate must be conducted by an independent testing facility, not the BMP manufacturer.

#### 1.2 Ordinance

The GSWMD through its City of Gary Stormwater Management Ordinance provides for the construction program that controls polluted runoff from construction sites with a land disturbance of greater than or equal to one acre as stated in Chapter 1, Section 2, Page 1; Chapter 4; and Chapter 6.

# 1.3 <u>Site Plan Review</u>

The GSWMD includes in its construction program requirements for the implementation of appropriate BMPs on construction sites to control erosion and sediment and other waste at the site. The GSWMD will determine if a construction site complies with such provisions of the City of Gary Stormwater Management Ordinance before ground is broken. Forms applicable to the site plan review through to project completion are provided in Appendix B of the City of Gary Stormwater Technical Standards Manual.

#### 1.4 <u>Inspections and Penalties</u>

Once construction commences, BMPs should be in place and The GSWMD's enforcement activities begun. To ensure that the BMPs are properly installed, the GSWMD will follow the City of Gary Stormwater Management Ordinance, which provides procedures for site inspection and enforcement of control measures to deter infractions. These procedures are stated in Chapter 2, Section 7, Page 7; Chapter 3, Section 7, Page 14; and Chapter 4, Section 4, Pages 18-19 of the Stormwater Management Ordinance of Gary, Indiana. Inspections give The GSWMD an opportunity to provide additional guidance and education, issue warnings, or assess penalties.

# 1.5 <u>Information Submitted by the Public</u>

The GSWMD will establish procedures for the receipt and consideration of public inquiries, concerns, and information submitted regarding local construction activities. This provision is intended to further reinforce the public participation component of the regulated small MS4 storm water program and to recognize the crucial role that the public can play in identifying instances of noncompliance. The GSWMD will review the information submitted, and will determine an appropriate course of action, which may not require follow-up or responses to every complaint or concern. The GSWMD will demonstrate acknowledgment and consideration of the information submitted. A simple tracking process in which submitted public information, both written and verbal, is recorded and then given to the construction site inspector for possible follow-up will be utilized. The GSWMD has purchased the ASIST database system to aid in this effort.

# 2. BMPS

# 2.1 Website

- 2.1.1 BMP Description The GSWMD will work with NIRPC to create and maintain a website with relevant storm water information.
- 2.1.2 Measurable Goals Create website and post information.
- 2.1.3 Possible Partners NIRPC
- 2.1.4 Timetable / Schedule Beginning in 2005, the GSWMD will work with NIRPC to create and maintain a website with storm water information. This will be ongoing.
- 2.1.5 Specific Target Outreach / Target Constituents Residents, Construction Site Personnel
- 2.1.6 Reduction Goal Percentage 100% Reduction of lack of GSWMD website.
- 2.1.7 Record Keeping Requirements Track the number of visitors to the website.
- 2.1.8 Environmental Benefits By having informed citizens, it increases the likelihood of their participation in the program.
- 2.1.9 Applicable MCMs This applies to MCMs 1, 2, 3, 4, 5, and 6.

# 2.2 City of Gary Stormwater Management Ordinance

- 2.2.1 BMP Description The GSWMD has created the City of Gary Stormwater Management Ordinance. This ordinance establishes the regulatory authority and complies with the updated Rule 13 and Rule 5 requirements.
- 2.2.2 Measurable Goals Adoption of the City of Gary Stormwater Management Ordinance.
- 2.2.3 Possible Partners None
- 2.2.4 Timetable / Schedule The City of Gary Stormwater Management Ordinance will be adopted in 2005.
- 2.2.5 Specific Target Outreach / Target Constituents Residents, Visitors, Public Service Employees, Commercial Facilities, Industrial Facilities, Construction Site Personnel
- 2.2.6 Reduction Goal Percentage 100% reduction of the lack of an illicit discharge and detection ordinance, construction site runoff control ordinance, and a post-construction runoff control ordinance.
- 2.2.7 Record Keeping Requirements The MS4 operator will retain a copy of the ordinance and the adoption date.
- 2.2.8 Environmental Benefits By establishing an ordinance, it allows the City to comply with the state regulations.
- 2.2.9 Applicable MCMs This applies to MCMs 3, 4, 5, and 6.

#### 2.3 Storm Water Hotline

- 2.3.1 BMP Description Complaints, information requests, and inquiries related to construction site erosion and sediment control will be incorporated into the Storm Water Hotline. Complaint forms will be completed for each call received. Complaints will be investigated, tracked, and resolved by the GSWMD.
- 2.3.2 Measurable Goals The establishment of the Storm Water Hotline, with the recording, investigation, and tracking of calls. Filing of complaint forms and resolution of complaints. Sorting of complaints by type, for example flooding, erosion, water quality, dumping, construction site, or other. Advertisement of the Storm Water Hotline on the City webpage, in the newspaper, or printed on a utility bill.
- 2.3.3 Possible Partners NIRPC
- 2.3.4 Timetable / Schedule The Storm Water Hotline will be initiated in 2005 and will continue throughout the permit term.
- 2.3.5 Specific Target Outreach / Target Constituents Residents, Construction Site Personnel.
- 2.3.6 Reduction Goal Percentage 100% reduction of lack of formal complaint system.
- 2.3.7 Record Keeping Requirements Complaint forms and investigation records will be kept on file at the City Hall office and reviewed annually to determine pollution concerns and recommendations for BMPs, if necessary.
- 2.3.8 Environmental Benefits By understanding where problems occur, it will enable The GSWMD to inspect and correct these problems.
- 2.3.9 Applicable MCMs This applies to MCM's 2, 3, 4, and 5.

#### 2.4 Stormwater Technical Standards Manual

- 2.4.1 BMP Description The GSWMD has created the City of Gary Stormwater Technical Standards Manual. This Manual includes principals and practices that comply with the updated Rule 13 and Rule 5 regulations.
- 2.4.2 Measurable Goals The City of Gary Stormwater Technical Standards Manual will be implemented for all development or redevelopment within the MS4 area that meets the land disturbance criteria.
- 2.4.3 Possible Partners GSWMD has worked with Lake County to establish these standards.
- 2.4.4 Timetable / Schedule Implementation of the standard will be ongoing. The standards will be adopted in 2005.
- 2.4.5 Specific Target Outreach / Target Constituents Residents, Public Service Employees, Commercial Facilities, Industrial Facilities, and Construction Site Personnel.
- 2.4.6 Reduction Goal Percentage Varies based on structural BMP installed.
- 2.4.7 Record Keeping Requirements The GSWMD operator will retain a copy of the current City of Gary Stormwater Technical Standards Manual.
- 2.4.8 Environmental Benefits By establishing the Technical Standards, it provides for compliance with the state regulations, and consistency among new stormwater facilities.
- 2.4.9 Applicable MCMs This BMP applies to 3, 4, 5 and 6.

#### 2.5 Plan Review for SWPP and Erosion and Sediment Control

- 2.5.1 BMP Description Plan Review for Storm Water Pollution Prevention (SWPP) and Erosion and Sediment Control will be incorporated into the current process. The plan reviewer will evaluate the plans per the City of Gary Stormwater Technical Standards Manual. A plan review checklist will be developed for the project site developer to use in the development of the SWPP and Erosion and Sediment Control Plans. The reviewer will use a Technical Review and Comment Form during SWPP and Erosion and Sediment Control Plan review. Comments on the SWPP and Erosion and Sediment Control Plans will be forwarded to the developer. Developer will make revisions based on the comments and submit revised SWPP and Erosion and Sediment Control Plans to the reviewer. This process will continue until an acceptable SWPP and Erosion and Sediment Control Plan is produced.
- 2.5.2 Measurable Goals All construction projects meeting the requirements of 327 IAC 15-5 (Rule 5) will be reviewed for SWPP and Erosion and Sediment Control measures. A plan review checklist for SWPP and Erosion and Sediment Control Plans will be made available to all developers.
- 2.5.3 Possible Partners Lake County Soil and Water Conservation District.
- 2.5.4 Timetable / Schedule The plan review process will be developed during 2005 and will be reviewed annually.
- 2.5.5 Specific Target Outreach / Target Constituents Public Service Employees, Construction Site Personnel
- 2.5.6 Reduction Goal Percentage 100% reduction of applicable construction sites that do not have SWPP and Erosion and Sediment Control Plans.
- 2.5.7 Record Keeping Requirements The GSWMD will record the number of permits issued by the MS4 each year and the number of hours dedicated to reviewing SWPP and Erosion and Sediment Control Plans.
- 2.5.8 Environmental Benefits By ensuring that construction sites have adequate plans in place prior to disturbing soil, it reduces the amount of sediment in the receiving streams.
- 2.5.9 Applicable MCMs This applies to MCMs 4, 5, and 6.

# 2.6 <u>Erosion and Sediment Control Inspections</u>

- 2.6.1 BMP Description The MS4 will develop policies and procedures for erosion and sediment control inspections and assign responsibilities for inspections. Inspections will be coordinated through the City.
- 2.6.2 Measurable Goals All construction sites issued Rule 5 permits will be inspected by the MS4.
- 2.6.3 Possible Partners Inspections to be conducted by construction site inspectors and MS4 personnel or their representatives.
- 2.6.4 Timetable / Schedule Erosion and sediment control inspections of construction sites will begin once the City of Gary Stormwater Management Ordinance has been approved.
- 2.6.5 Specific Target Outreach / Target Constituents Public Service Employees, Construction Site Personnel.
- 2.6.6 Reduction Goal Percentage 100% reduction of applicable construction sites not being inspected.
- 2.6.7 Record Keeping Requirements The results of inspections and enforcement actions will be recorded on inspection sheets and included in the monthly reports and the annual report. Record the total number of construction sites inspected. Record the number of incidents of non-compliance or deficiencies identified through inspections. Document corrective actions taken by project site owners/contractors based upon site inspections. Maintain copies of inspection forms.
- 2.6.8 Environmental Benefits By inspecting construction sites, it ensures that sediment remains on site and not in the receiving streams.
- 2.6.9 Applicable MCMs This applies to MCM 4, 5, and 6.

# 2.7 <u>Enforcement of Erosion and Sediment Control Requirements</u>

- 2.7.1 BMP Description As required, the MS4 will take enforcement actions for noncompliance with the construction site runoff and erosion control program requirements. Enforcement actions will be as stated in the City of Gary Stormwater Management Ordinance.
- 2.7.2 Measurable Goals All enforcement actions will be recorded on inspection sheets, included in monthly reports to IDEM, and included in annual reports.
- 2.7.3 Possible Partners None
- 2.7.4 Timetable / Schedule Policies and procedures for enforcement of erosion and sediment control requirements will be put into place once the City of Gary Stormwater Management Ordinance has been accepted.
- 2.7.5 Specific Target Outreach / Target Constituents Public Service Employees, Construction Site Personnel.
- 2.7.6 Reduction Goal Percentage 80% reduction of construction site non-compliance.
- 2.7.7 Record Keeping Requirements Record the number and type of enforcement actions taken. Record the results of the enforcement actions (project termination, correction of deficiencies, etc.)
- 2.7.8 Environmental Benefits By enforcing the City of Gary Stormwater Management Ordinance and the City of Gary Stormwater Technical Standards Manual it will reduce the pollution in the receiving streams.
- 2.7.9 Applicable MCMs This applies to MCMs 4, 5, and 6.

# 2.8 <u>Training of Plan Reviewer and Construction Site Inspector</u>

- 2.8.1 BMP Description MS4 area personnel responsible for plan review, inspection, and enforcement of construction BMPs will receive annual training addressing appropriate control measures, inspection protocol, and enforcement procedures.
- 2.8.2 Measurable Goals All MS4 reviewers and inspectors will receive training on an annual basis.
- 2.8.3 Possible Partners The GSWMD may work with the following organizations in order to provide training: IDEM, IDNR, IACT, and County SWCD.
- 2.8.4 Timetable / Schedule Training will begin in 2005 and will be conducted at least annually.
- 2.8.5 Specific Target Outreach / Target Constituents Public Service Employees, Construction Site Personnel
- 2.8.6 Reduction Goal Percentage 100% of untrained plan reviewers and inspection staff will be trained.
- 2.8.7 Record Keeping Requirements The MS4 Entity will maintain documentation that all plan reviewers and site inspectors have received annual sediment and erosion control training. Retain documentation of the number of reviewers and site inspectors either trained or qualified in erosion and sediment control measures. Documentation includes sign-in sheets, meeting agendas, and training handouts for post-construction training sessions.
- 2.8.8 Environmental Benefits By ensuring that the plan reviewer and construction site inspector are trained, it reduces the likelihood of improper erosion controls.
- 2.8.9 Applicable MCMs This applies to MCM 4.

#### 2.9 Erosion and Sediment Control Construction Plan Review for MS4 Projects

- 2.9.1 BMP Description All applicable construction activities operated by the MS4 will be submitted to the Lake County Soil and Water Conservation District (SWCD) for review and approval. The construction plans will be reviewed for conformance with the City of Gary Stormwater Management Ordinance and the City of Gary Stormwater Technical Standards Manual.
- 2.9.2 Measurable Goals All construction plans for applicable MS4 projects will be reviewed by the Lake County SWCD for construction site erosion and sediment control.
- 2.9.3 Possible Partners Lake County Soil and Water Conservation District.
- 2.9.4 Timetable / Schedule All GSWMD plans are currently reviewed by the SWCD. This process will continue until one year following the acceptance of the City of Gary Stormwater Management Ordinance in 2005, if the DNR and MS4 agree that the MS4 is in compliance and able to review its own plans.
- 2.9.5 Specific Target Outreach / Target Constituents Public Service Employees, Construction Site Personnel
- 2.9.6 Reduction Goal Percentage Not Applicable
- 2.9.7 Record Keeping Requirements Notices of Intent will be sent to IDEM after plans are approved. Correspondence between the SWCD/DNR and the MS4 regarding plan review will be kept on file for evaluation.
- 2.9.8 Environmental Benefits By having Lake County Soil and Water Conservation District review MS4 operator's construction plans, it ensures that erosion controls are being applied appropriately.
- 2.9.9 Applicable MCMs This applies to MCMs 4, 5, and 6.

#### 2.10 Coordinate Training Efforts

- 2.10.1 BMP Description The GSWMD will work NIRPC and with other governmental and professional organizations to ensure that public service employees receive at least annual training in pollution prevention and good housekeeping techniques.
- 2.10.2 Measurable Goals All municipal employees will receive annual storm water pollution prevention and good housekeeping training.
- 2.10.3 Possible Partners The GSWMD may work with the following organizations in order to provide training: NIRPC, IDEM, IDNR, IACT, and County SWCD.
- 2.10.4 Timetable / Schedule Training will begin in 2005 and will continue annually.
- 2.10.5 Specific Target Outreach / Target Constituents Public Service Employees, Commercial Facilities, Industrial Facilities
- 2.10.6 Reduction Goal Percentage 100% of untrained personnel staff will be trained.
- 2.10.7 Record Keeping Requirements Retain copies of sign-in sheets, meeting agendas and training handouts.
- 2.10.8 Environmental Benefits By ensuring that the plan reviewer and construction site inspector are trained, it reduces the likelihood of improper erosion controls.
- 2.10.9 Applicable MCMs This applies to MCMs 4, 5, and 6.

- 2.11 Review New Development Plans and Inspect New Developments for Cross Connections
  - 2.11.1 BMP Description The GSWMD will require a review of new development plans and an inspection of new developments for cross connections between storm sewers and sanitary sewers.
  - 2.11.2 Measurable Goals The GSWMD will review the new development plans and inspect developments for cross connections.
  - 2.11.3 Possible Partners None
  - 2.11.4 Timetable / Schedule Beginning in 2005, the GSWMD will review plans and inspect developments for cross connections. This will be ongoing.
  - 2.11.5 Specific Target Outreach / Target Constituents Public Service Employees, Construction Site Personnel
  - 2.11.6 Reduction Goal Percentage 100% reduction of new developments with cross connections.
  - 2.11.7 Record Keeping Requirements The GSWMD will record the number of new developments reviewed and inspected. The City will also record the number of violations and corrections.
  - 2.11.8 Environmental Benefits By eliminating cross connections, storm sewers should only discharge storm water. This eliminates the possibility of sanitary sewage discharging to the receiving streams through the storm sewer system.
  - 2.11.9 Applicable MCMs This applies to MCMs 3 and 4.

# 3. PROGRAMMATIC INDICATORS

# 3.1 Required Programmatic Indicators

- (1) Number of construction sites obtaining an MS4 entity-issued storm water run-off permit in the MS4 area.
- (2) Number of construction sites inspected.
- (3) Number and type of enforcement actions taken against construction site operators.
- (4) Number of, and associated construction site name and location for, public informational requests received.
- (5) Number, type, and location of structural BMPs installed.
- (6) Number, type, and location of structural BMPs inspected.

# 3.2 MS4 Entity Initiated Programmatic Indicator

Notices of Intent will be sent to IDEM after plans are approved. Correspondence between the SWCD/DNR and the MS4 regarding plan review will be kept on file for evaluation.

# 4. SUMMARY SHEETS

- 4.1 <u>Forms</u>
- 4.2 <u>Additional Information</u>

# 5. REFERENCE MATERIALS

The GSWMD has summarized the BMPs, measurable goals and recordkeeping measures in Table 10.2 MCM-4: Construction Site Storm Water Run-Off Control Summary of Measurable Goals below:

TABLE 10.2 MCM-4: CONSTRUCTION SITE STORM WATER RUN-OFF CONTROL SUMMARY OF MEASURABLE GOALS

ВМР	MEASURABLE GOAL	SCHEDULE	RECORD KEEPING REQUIREMENTS	ENVIRONMENTAL BENEFIT
Website	Create website and post information.	Beginning in 2005, the GSWMD will work with NIRPC to create and maintain a website with stormwater information. This will be ongoing.	Track the number of visitors to the website.	By having informed citizens, it increases the likelihood of their participation in the program.
City of Gary Stormwater Management Ordinance. This Ordinance establishes regulatory authority and complies with the updated Rule 13 and Rule 5 requirements.	Adoption of the City of Gary Stormwater Management Ordinance.	The City of Gary Stormwater Management Ordinance will be adopted in 2005.	The MS4 operator will retain a copy of the ordinance and the adoption date.	By establishing an ordinance, it allows the City to comply with the state regulations.

Storm Water	The	The Storm Water	Complaint forms	By understanding
Hotline	establishment of	Hotline will be	and investigation	where problems
	the Storm Water	initiated in 2005	records will be	occur, it will
	Hotline. The	and will continue	kept on file at the	enable The
	recording,	throughout the	City Hall office	GSWMD to
	investigation,	permit term.	and reviewed	inspect and correct
	and tracking of		annually to	these problems.
	calls. Filing of		determine	
	complaint forms		pollution concerns	
	and resolution of		and	
	complaints.		recommendations	
	Sorting of		for BMPs, if	
	complaints by		necessary.	
	type, for			
	example			
	flooding,			
	erosion, water			
	quality,			
	dumping,			
	construction site,			
	or other.			
	Advertisement			
	of the Storm			
	Water Hotline			
	on the City			
	webpage, in the			
	newspaper, or			
	printed on a			
	utility bill.			

Stormwater Technical Standards Manual	The GSWMD Stormwater Technical Standards Manual will be implemented for all development or redevelopment within the MS4 area that meets the land disturbance criteria.	Implementation of the standard will be ongoing. The standards will be adopted in 2005.	The GSWMD operator will retain a copy of the current City of Gary Stormwater Technical Standards Manual.	By establishing the Technical Standards, it provides for compliance with the state regulations, and consistency among new stormwater facilities.
Plan Review for SWPP and Erosion and Sediment Control	All construction projects meeting the requirements of 327 IAC 15-5 (Rule 5) will be reviewed for SWPP and Erosion and Sediment Control measures. A plan review checklist for SWPP and Erosion and Sediment Control Plans will be made available to all developers.	The plan review process will be developed during 2005 and will be reviewed annually.	The GSWMD will record the number of permits issued by the MS4 each year and the number of hours dedicated to reviewing SWPP and Erosion and Sediment Control Plans.	By ensuring that construction sites have adequate plans in place prior to disturbing soil, it reduces the amount of sediment in the receiving streams.

Erosion and	All construction	Erosion and	The results of	By inspecting
Sediment	sites issued Rule	sediment control	inspections and	construction sites,
Control	5 permits will be	inspections of	enforcement	it ensures that
Inspections	inspected by the	construction sites	actions will be	sediment remains
Inspections	MS4.	will begin once	recorded on	on site and not in
	W154.	_		
		the City of Gary Stormwater	inspection sheets and included in	the receiving
				streams.
		Management	the monthly	
		Ordinance has	reports and the	
		been approved.	annual report.	
			Record the total	
			number of	
			construction sites	
			inspected. Record	
			the number of	
			incidents of non-	
			compliance or	
			deficiencies	
			identified through	
			inspections.	
			Document	
			corrective actions	
			taken by project	
			site owners	
			/contractors based	
			upon site	
			inspections.	
			Maintain copies of	
			inspection forms.	
Enforcement of	All enforcement	Policies and	Record the	By enforcing the
Erosion and	actions will be	procedures for	number and type	City of Gary
Sediment	recorded on	enforcement of	of enforcement	Stormwater
Control	inspection	erosion and	actions taken.	Management
Requirements	sheets, included	sediment control	Record the results	Ordinance and the
	in monthly	requirements will	of the enforcement	City of Gary
	reports to IDEM,	be put into place	actions (project	Stormwater
	and included in	once the City of	termination,	Technical
	annual reports.	Gary Stormwater	correction of	Standards Manual
	Toports.	Management	deficiencies, etc.)	it will reduce the
		Ordinance has		pollution in the
		been accepted.		receiving streams.
		been accepted.		receiving streams.

Training of Plan	All MS4	Training will	The MS4 Entity	By ensuring that
Reviewer and	reviewers and	begin in 2005	will maintain	the plan reviewer
Construction Site	inspectors will	and will be	documentation	and construction
Inspector	receive training	conducted at	that all plan	site inspector are
	on an annual	least annually.	reviewers and site	trained, it reduces
	basis.		inspectors have	the likelihood of
			received annual	improper erosion
			sediment and	controls.
			erosion control	
			training. Retain	
			documentation of	
			the number of	
			reviewers and site	
			inspectors either	
			trained or	
			qualified in	
			erosion and	
			sediment control	
			measures.	
			Documentation	
			includes sign-in	
			sheets, meeting	
			agendas, and	
			training handouts	
			for post-	
			construction	
			training sessions.	

Erosion and Sediment Control Construction Plan Review for MS4 Projects	All construction plans for applicable MS4 projects will be reviewed by the Lake County SWCD for construction site erosion and sediment control.	All GSWMD plans are currently reviewed by the SWCD. This process will continue until one year following the acceptance of the City of Gary Stormwater Management Ordinance in 2005, if the DNR and MS4 agree that the MS4 is in compliance and able to review its own plans.	Notices of Intent will be sent to IDEM after plans are approved. Correspondence between the SWCD, DNR, and the MS4 regarding plan review will be kept on file for evaluation.	By having Lake County Soil and Water Conservation District review MS4 operator's construction plans, it ensures that erosion controls are being applied appropriately.
Coordinate Training Efforts	All municipal employees will receive annual storm water pollution prevention and good housekeeping training.	Training will begin in 2005 and will continue annually.	Retain copies of sign-in sheets, meeting agendas and training handouts.	By ensuring that the plan reviewer and construction site inspector are trained, it reduces the likelihood of improper erosion controls.
Review New Development Plans and Inspect New Developments for Cross Connections between storm sewers and sanitary sewers.	The GSWMD will review the new development plans and inspect developments for cross connections.	Beginning in 2005, the GSWMD will review plans and inspect developments for cross connections. This will be ongoing.	The GSWMD will record the number of new developments reviewed and inspected. The City will also record the number of violations and corrections.	By eliminating cross connections, storm sewers should only discharge storm water. This eliminates the possibility of sanitary sewage discharging to the receiving streams through the storm sewer system.