

STORMWATER QUALITY MANAGEMENT PLAN

2014-2019

Eastern Kentucky University

**Environmental Resources
& Energy Management**

Facilities Services



STORMWATER QUALITY MANAGEMENT PLAN

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Background and Purpose

Storm sewer systems are designed to collect and convey storm water runoff from street inlets, runoff control structures, and other locations where the accumulation of storm water is undesirable. The objective is to remove runoff from an area fast enough to avoid unacceptable ponding, inconvenience or damage.

The Clean Water Act (CWA) was passed in 1972 to help protect and restore the waters in the streams, rivers, and lakes of the nation. In 1990, Phase I of the National Pollutant Discharge Elimination System (NPDES), under authority of the CWA, was passed to regulate storm water management in large urban areas. Late in that same decade, Phase II regulations were developed and passed that require medium size cities meeting a certain population density and other criteria to develop storm water initiatives to address pollution associated with urban runoff.

The Phase II Rule was enacted to improve the quality of storm water runoff from Municipal Separate Storm Sewer Systems (MS4's) previously not included in the NPDES permitting program. Phase II automatically covers on a nationwide basis all small MS4s located in "urbanized areas" (UAs) as defined by the Bureau of the Census (unless waived by the NPDES permitting authority), and on a case-by-case basis those small MS4s located outside of UAs that the NPDES permitting authority designates. EKU falls under the latter category.

Target pollutants include roadway oil and grease, landscaping pesticides, construction site sediment and commonly discarded trash such as cigarette butts, paper wrappers, and plastic bottles. Operators of regulated small MS4s are required to design their programs to:

- Reduce the discharge of pollutants to the "maximum extent practicable" (MEP)
- Protect water quality
- Satisfy the appropriate water quality requirements of the Clean Water Act

This is achieved by meeting the following Minimum Control Measures (MCM's):

1. Provide public education on the impacts of polluted urban runoff
2. Establish programs for public involvement and participation
3. Develop and implement a plan for illicit discharge detection and elimination
4. Establish guidelines and develop and implement a program of control for construction site storm water runoff when more than 1 acre is disturbed
5. Establish guidelines and develop and enforce a program for post-construction storm water management
6. Develop and implement responsible campus operations for good housekeeping and pollution prevention

**STORMWATER QUALITY
MANAGEMENT PLAN**
EASTERN KENTUCKY UNIVERSITY



EKU operates under the requirements of the Kentucky Pollutant Discharge Elimination System (KPDES). As such, the University has developed and is implementing and enforcing the Best Management Practices (BMP's) outlined in this Stormwater Quality Management Plan (SWQMP) that address each of the MCM's. The primary goal of this SWQMP is to protect and maintain the physical, biological and chemical integrity of the waters of the Commonwealth through management and treatment of stormwater (hereafter SW) runoff through adherence to the requirements of the EPA Stormwater Phase II rule.

Bill Rhodes
Assistant Director Facilities Services
Environmental Resources & Energy Management
Eastern Kentucky University
521 Lancaster Avenue
Richmond, KY 40475

859 622-4104
bill.rhodes@eku.edu

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



Table of Contents

MCM 1. Public Education and Outreach.....	1
BMP 1.A. Maintain a Public Education Program	1
BMP 1.B. Conduct Public Outreach Activities.....	2
MCM 2. Public Involvement and Participation	3
BMP 2.A. Implement a Public Involvement and Participation Program	3
BMP 2.B. Track Implementation.....	4
MCM 3. Illicit Discharge Detection and Elimination.....	6
BMP 3.A. Verify Illicit Discharge Detection and Elimination Ordinance	6
BMP 3.B. Implement Illicit Discharge Detection and Elimination Program	6
BMP 3.C. Educate Students, Faculty and Staff	8
BMP 3.D. Develop and Maintain a Storm Sewer System Map	8
BMP 3.E. Perform Dry Weather Discharge Inspections	9
BMP 3.F. Provide Mechanism for Public Reporting of Spills	10
BMP 3.G. Inform KDOW of Any Illicit Discharges	10
BMP 3.H. Track Implementation.....	11
MCM 4. Construction Site Stormwater Runoff.....	12
BMP 4.A. Verify Construction Site SW Runoff Ordinance	12
BMP 4.B. Implement Construction Site SW Runoff Compliance Program.....	13
BMP 4.C. Provide Mechanism for Public Reporting of Spills	14
MCM 5. Post-Construction Stormwater Management	15
BMP 5.A. Verify Post-Construction SW Runoff Ordinance	15
BMP 5.B. Implement Post-Construction SW Runoff Compliance Program.....	15
BMP 5.C. Provide Mechanism for Public Reporting of Spills	16
MCM 6. Pollution Prevention & Good Housekeeping.....	17
BMP 6.A. Publicize Appropriate Waste Disposal Procedures.....	17
BMP 6.B. Maintain Campus SW Inventory	17
BMP 6.C. Develop and Distribute a SW Training Program.....	18
BMP 6.D. Provide SW Training	18
BMP 6.F. Track Implementation.....	19
7. Future Water Quality Monitoring Program.....	20

STORMWATER QUALITY MANAGEMENT PLAN



EASTERN KENTUCKY UNIVERSITY

7.A. Select BMP Monitoring Program Strategy.....	20
7.B. Determine Monitoring Locations	20
7.C. Determine Sampling Parameters	20
7.D. Determine Sampling/Monitoring Frequencies	21
7.E. Project Budget.....	21
8. Funding	22
8.A. Develop Budget	22
8.B. Obtain Funding	22
9. Annual Report.....	24
9.A. Report Results of Measureable Goals	24
9.B. Report Any Discharges or Spills	24
9.C. Provide Overall Program Review	25
9.D. Report Expenses and Budget.....	25
9.E. Submit Annual Report to the Kentucky Department of Water.....	25
10. Affirmation of Ownership.....	27

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



MCM 1. Public Education and Outreach

EKU will conduct outreach activities about the impacts of SW discharges on local water bodies and the steps that can be taken to reduce SW pollution.

The following Best Management Practices (BMP's) accomplish MCM 1.

BMP 1.A. Maintain a Public Education Program

Description: Maintain a public education program to raise awareness about the impacts of SW discharges to water bodies and the steps that the campus community can take to reduce pollutants in SW runoff.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
1.A.1. Engage the EKU Committee for Responsible Environmental Stewardship			1				
Prepare and review a proposed SWQMP with the Chair of the EKU Committee for Responsible Environmental Stewardship (ECRES) and the Director of EH&S (committee member). Obtain concurrence on SWQMP ownership assignments.	Draft SWQMP reviewed with ECRES Chair and Director, EH&S; modified and signed.	Asst Director Environmental Resources and Energy Mgmt (EREM)					
1.A.2. Develop and/or select education materials and decide how they will be distributed			2	4			
Review the education materials used by the City of Richmond, the Stormwater Education Toolkit developed by KYTC and SW education materials from the EPA for content, cost, and potential effectiveness. Develop an annual message for mass distribution potentially using e-mail, Facebook, brochures, etc. Choose materials and determine changes needed to make them fully applicable. Choose delivery methods for maximum effectiveness and affordability. Review at least biannually.	Materials and methods of distribution selected	ECRES					
1.A.3. Acquire and distribute education materials			2	3	4	5	
Purchase, reproduce or otherwise obtain materials and distribute.	Number of unique education pieces provided and number of each distributed	ECRES					
1.A.4. Conduct annual review and evaluation of education program			2	3	4	5	
Review activities conducted in the previous year for completion and for benefit to the campus community to determine if the objectives are being met. Assess whether the message was successfully	Annual review held and results sent to Asst Dir EREM	ECRES Chair					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



received. Determine changes that need to be made.
Establish a list of target audiences and report findings.

BMP 1.B. Conduct Public Outreach Activities

Description: Conduct at least one public outreach activity on campus that focuses on impacts from SW discharges to water bodies and things the campus community can do to reduce pollutants in SW runoff.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
1.B.1. Determine annual activity/ies			1	2	3	4	5
Review related on-campus events and available resources to establish a workable schedule of activities throughout the year, as much as possible. Choose activities that focus on different areas of campus or different audiences. Provide special events, participate in workshops or presentations, and/or provide printed materials that focus on a target audience or pollutant. Alter audiences or pollutant each year as applicable.	Calendar completed	ECRES					
1.B.2. Participate in KSA and BRASS			1	2	3	4	5
Take advantage of opportunities for training and exchange of ideas with the Kentucky Stormwater Association (KSA) and the Bluegrass Regional Alliance for Stormwater Success (BRASS). Attend regular and/or sub-committee meetings for SW program material development, educational benefit, and MS4 community collaboration.	KSA meetings attended	ECRES Chair, Sustainability Coordinator, Director EH&S, Asst Dir EREM					
1.B.3. Conduct annual review and evaluation of outreach activity/ies			2	3	4	5	
Review activities conducted in the previous year for completion and for benefit to the campus community to determine if the objectives are being met. Determine changes that need to be made. Prepare a financial summary for each activity. Provide a budget projection for the next year, including funding sources.	Annual review held and results sent to Asst Dir EREM	ECRES Chair					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



MCM 2. Public Involvement and Participation

EKU will comply with state and local requirements for Public Involvement and Participation and maintain performance measures.

The following BMP's ensure MCM 2.

BMP 2.A. Implement a Public Involvement and Participation Program

Description: Activities may include:

- representation on SW management work group (ECRES sub-committee)
- facilitating volunteer education
- assisting with program coordination
- monitoring efforts

All program participation opportunities shall be publicized.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
2.A.1. Insure appropriate ECRES representation			1				
Identify relevant stakeholder communities, both on and off campus, for the purpose of guiding the SW program. ECRES membership should provide a variety of perspectives relative to their involvement with the campus, which will help the program gain consensus for the program needs, goals, and actions.	Member list confirmed	ECRES Chair					
2.A.2. Hold ECRES meetings			1	2	3	4	5
Publicize regular time and location of ECRES meetings and hold meetings.	Minimum of two (2) per year.	ECRES Chair					
2.A.3. Develop list of possible volunteer activities			2			4	
Determine what activities volunteers could do that would be most beneficial to ECU. Select actions that may be completed by volunteers based on complexity, safety, cost, available materials, skill sets, and staff support. Review at least biannually.	Number of activities, number of groups included	ECRES					
2.A.4. Identify potential sources of volunteers			2			4	
Initiate involvement with campus and community groups to cultivate volunteer opportunities. Establish a list and make contacts. Review biannually.	Number of groups contacted	ECRES					
2.A.5. Develop potential list of public involvement and volunteer activities			2			4	
Public involvement activities list shall include events in which campus and community groups and individuals can participate to address water quality	Completed list	ECRES					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



concerns. List should consider available volunteer groups, campus environmental organizations, applicable campus events, etc., as well as pollutants of most concern. Review biannually.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
2.A.6. Conduct annual public involvement and volunteer activities							
From the potential list, determine the annual activities and schedule accordingly. Evaluate available budget, staffing and timing of events to establish a plan for the year. Publicize all activities.	Number of activities held and number of participants	ECRES	2	3	4	5	
2.A.7. Establish means to measure activities							
Identify ways to quantify changes in public involvement. Post surveys, etc. that can identify changes in behavior (less litter, debris, fewer hotline reports, more volunteers, etc.) and participation in water quality initiatives.	TBD	ECRES	2	3	4	5	
2.A.8. Conduct annual review and evaluation of program							
Review activities conducted in the previous year for completion and for benefit to the campus community to determine if the objectives are being met. Assess whether activities were sufficient and if the message was successfully received. Determine changes that need to be made.	Annual review held and results sent to Asst Dir EREM	ECRES Chair	2	3	4	5	

BMP 2.B. Track Implementation

Description: Track measures to determine if the public involvement efforts are reaching the target audiences and creating the behavioral changes desired. Items to measure may include:

- identification of activity, date, name, and number of persons involved
- message(s) delivered
- expenses
- personnel involved in implementation

Maintain and update a spreadsheet to reflect all activities. Expand information as applicable to enhance review and evaluation capabilities.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
2.B.1 Document Public Involvement							
Ensure public involvement activities are conducted. Track measures of public involvement activities.	Spreadsheet completed on common SWQMP	ECRES Chair	1	2	3	4	5

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



Use a spreadsheet to list and quantify activities and outcomes to meet annual reporting needs.

format and sent to
Asst Dir EREM

**Perform in
Permit Year:**

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	1	2	3	4	5
2.B.2. Provide fiscal record for each activity conducted							
Tally total resources and expenses for the previous 12 months of the permit period.	Spreadsheet completed on common SWQMP format and sent to Asst Dir EREM	ECRES Chair	2	3	4	5	5
2.B.3. Provide budget projection							
Project budget requirements and any additional resources required to execute planned public involvement activities for the next year of the permit.	Spreadsheet completed on common SWQMP format and sent to Asst Dir EREM	ECRES Chair	1	2	3	4	5

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



MCM 3. Illicit Discharge Detection and Elimination

Recognizing the adverse effects illicit discharges can have on receiving waters, ECU will develop, implement and enforce an illicit discharge detection and elimination program (IDDE). Illicit discharges include wastes and wastewater from non-SW sources which municipal storm sewer systems are not designed to accept, process or discharge. Sources of illicit discharges may include sanitary wastewater illegally connected to the storm drain system, laundry wastewater, chemical wastes, spills from roadways and improper disposal of petroleum products, paint or pesticides. The campus community will be informed of the hazards of improper disposal of waste. All major outfalls to the City will be identified and monitored.

EKU is under the jurisdiction of the City of Richmond and the SW ordinances established by the City as part of their SWQMP.

The following BMP's ensure MCM 3.

BMP 3.A. Verify Illicit Discharge Detection and Elimination Ordinance

Description: ECU will ensure compliance with local ordinance that prohibits illicit discharges to the storm sewer.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>Perform in Permit Year:</u>				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
3.A.1. Identify city ordinance for controlling illicit discharges			1				
Obtain copy of ordinance controlling illicit discharges. Define illicit discharges, relay details of illicit discharge prohibitions and itemize the requirements for removal of illicit discharges.	Ordinance summary available	Asst Dir EREM					
3.A.2. Distribute ordinance			1				
Ensure affected departments are aware of city ordinance.	Provide copies of illicit discharge ordinance and summarization to ECRES Chair, Capital Planning, Facilities Services and Public Safety	Asst Dir EREM					

BMP 3.B. Implement Illicit Discharge Detection and Elimination Program

Description: Develop procedures for identifying and addressing priority areas for SW quality management.

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



Perform in
Permit Year:

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>Perform in Permit Year:</u>				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
3.B.1. Identify responsible staff for implementing IDDE program			1				
Determine who has responsibility within EKU for IDDE. Review ordinance and understand requirements to meet KPDES permit. Review all potential sources of assistance and identify the specific persons.	All responsibilities assigned	ECRES					
3.B.2. Provide Field Training for Facilities Services staff			2 4				
Provide annual training for field and other affected Facilities staff on the components of the IDDE program. Potential topics include receipt and response to reported spills, outfall investigations, sample acquisition and testing, source tracing, removal mechanisms, etc. Perform at least biannually.	Number of trainings provided, number of persons trained	Director EH&S					
3.B.3. Establish protocol for source tracing			2				
Develop a procedure for tracing an illicit discharge that includes a visual inspection, contributing network analysis and troubleshooting, tracking of known hotspots, and collection and analysis of water samples. Other detailed inspection procedures shall be identified and completed as needed. Consider available manpower, equipment and sample testing capacity in developing this protocol. Evaluate whether SW mapping is sufficient to be effective in tracing problems.	Procedure in place	ECRES Chair and Director EH&S					
3.B.4. Establish procedures for illicit discharge source removal			2				
Develop or modify procedures for removing an illicit discharge when appropriate or required. Procedures shall include: <ul style="list-style-type: none"> notification of appropriate authorities technical assistance for eliminating the discharge follow-up inspections 	Procedure in place	Director EH&S					
3.B.5. Establish means to measure activities			2				
Identify ways to quantify IDDE program effectiveness; number and type of spills or illicit discharges identified, number and schedule of inspections, number of hotline reports, as well as actual improvements in SW discharge.	TBD	ECRES					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



Perform in
Permit Year:

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
3.B.6. Conduct annual review and evaluation of the IDDE program							
Record measurable results that can identify trends and behavioral change. Review the components of the IDDE program for compliance with the rest of the SWQMP, effectiveness, and thoroughness.	Annual review held and results sent to Asst Dir EREM	ECRES Chair		2	3	4	5

3.B.7. Revise and Implement updated IDDE program							
Based on any areas of deficiency, revise the IDDE program and implement the new procedures. Educate affected staff on changes as part of the training for the following year. Document the need for change and any additional resource requirements.	Revisions implemented	ECRES		2	3	4	5

BMP 3.C. Educate Students, Faculty and Staff

Description: In addition to Public Education and Outreach, EKU shall inform the campus community of the hazards associated with illegal discharges and improper disposal of waste, including how to identify and report an illicit discharge.

Perform in
Permit Year:

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
3.C.1. Perform mass distribution of educational materials							
Conduct at least one activity associated with a mass distribution of core SW program information to all individuals in the campus community.	<ul style="list-style-type: none"> Number of students, faculty and staff receiving the illicit discharge information Number of illicit discharge reports 	ECRES		2	3	4	5

3.C.2. Conduct facilities staff training								
Hold one (1) employee training on the hazards associated with illegal discharges and improper disposal of waste.	Number of persons trained	Director EH&S		1	2	3	4	5

BMP 3.D. Develop and Maintain a Storm Sewer System Map

Description: Storm sewer map shall include:

- storm sewer infrastructure
- campus boundary
- location of all known major outfalls

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
3.D.1. Determine location of major outfalls			1				
Perform a review of the storm sewer network and identify all major outfalls.	All outfalls identified	Asst Dir EREM					
3.D.2. Develop and maintain system map			2				
Establish roles and resources for updating system map or to include new or modified lines and outfalls resulting from new development, capital projects, etc. System map shall be developed and maintained in electronic format. Paper maps to be readily available for field staff and field investigations. Update as needed.	Map complete and hardcopies available	Asst Dir EREM					

BMP 3.E. Perform Dry Weather Discharge Inspections

Description: Visually inspect all outfalls from the campus during dry weather for evidence of illicit discharges at least once per permit cycle. Indicators of pollutants include odor, oil sheens, discoloration, and high degrees of siltation or aquatic plant growth. Address any illicit discharges found.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
3.E.1. Develop schedule of screening for major outfalls			1				
All major outfalls shall have a visual screening within the permit cycle. Target inspecting 20% of outfalls annually and focus attention first on areas deemed a priority, based on the field assessment.	Schedule complete	Director EH&S					
3.E.2. Perform visual inspections of outfalls			1 2 3 4 5				
Develop a visual inspection checklist for indicators of pollutants, including odor, oil sheens, discoloration, high degrees of siltation, and excessive aquatic plant growth to use during outfall inspections.	Completed checklist for scheduled outfalls	Director EH&S					
3.E.3. Document location of all known pollutants during outfall inspection and address			1 2 3 4 5				
If pollutants/discharges are indicated during screening, develop an action plan to determine the likely source(s). Action plan should be based on known hot spots, HAZMATs stored within the outfall-shed, past history, and characteristics of the discharge indicators. Complete any follow-up water quality sampling and/or laboratory analysis.	All known illicit discharges addressed and documented	Director EH&S					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



BMP 3.F. Provide Mechanism for Public Reporting of Spills

Description: Develop a mechanism to provide for the public reporting of spills and other discharges. EKU shall keep a record of spill reports received and actions taken and include that information in the annual report.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>Perform in Permit Year:</u>					
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	
3.F.1. Provide for public reporting of spills and other discharges			1					
Implement SW quality hotline for reporting of spills and other discharges. Keep a record of all reports received. Report all incidents to the Director of EH&S and any incidences that may be in violation of local ordinance to EKU Public Safety.	Hotline, recording and reporting procedures all in place	Asst Dir EREM						
3.F.2. Record actions taken			1	2	3	4	5	
Record actions taken for each spill or discharge.	Documented actions for current year's spills	Director EH&S						

BMP 3.G. Inform KDOW of Any Illicit Discharges

Description: If an illicit discharge is determined to be caused by a defect in a source to the University, EKU shall inform the entity, as well as KDOW's Regional Office.

If EKU is responsible for an illicit discharge, the University will proceed with remediating the discharge by following a corrective action plan on a schedule approved by KDOW.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>Perform in Permit Year:</u>					
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	
3.G.1. Inform KDOW of any illicit discharges			1	2	3	4	5	
Know correct contact information at KDOW relating to any illicit discharges and if an illicit discharge is detected, inform KDOW.	Documented in Actions Taken for each illicit discharge	Director EH&S						
3.G.2. Develop remediation activities			1					
Remediation activities shall be initiated ASAP, according to the magnitude of the illicit discharge. Be familiar with remediation activities and procedures such as spill response, cleanup, public notification, evacuation routes traffic control, available equipment and response agencies.	Remediation procedures in place and included in IDDE training	Director EH&S						
3.G.3. Employ corrective action plan to adjust procedures as needed			1	2	3	4	5	
Evaluate the cause of the discharge for potential prevention and the response plan for potential areas	Reviewed with ECRES annually	Director EH&S						

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



of improvement. Perform post-response and remediation review to determine if issues were preventable, if response was effective, where improvements could be made, etc. (review local sanitary overflow plan as a potential model to follow)

BMP 3.H. Track Implementation

Description: Track measures to determine if the IDDE program is being followed and is identifying and remediating pollution.

Maintain and update spreadsheet to reflect all activities. Expand information as applicable to enhance review and evaluation capabilities.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
3.H.1. Document IDDE activities			1	2	3	4	5
Ensure IDDE compliance activities. Track program measures, education, inspections and reporting. Use a spreadsheet to list and quantify results to meet annual reporting needs.	Spreadsheet completed on common SWQMP format	ECRES Chair and Asst Dir EREM					
3.H.2. Provide fiscal record for each activity conducted			2	3	4	5	
Tally total resources and expenses for the previous 12 months of the permit period.	Spreadsheet completed on common SWQMP format	ECRES Chair and Asst Dir EREM					
3.H.3. Provide budget projection			1	2	3	4	5
Project budget requirements and any additional resources required to execute the IDDE plan for the next year of the permit.	Spreadsheet completed on common SWQMP format	ECRES Chair and Asst Dir EREM					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



MCM 4. Construction Site Stormwater Runoff

The Phase II Final Rule requires an operator of a regulated small MS4 to develop, implement, and enforce a program to reduce pollutants in storm water runoff from construction activities that result in a land disturbance of greater than or equal to one acre, utilizing both types of construction site SW runoff control:

- Non-Structural - incorporation of site planning and design techniques to control SW runoff, including the use of open space, vegetated conveyance and buffers, natural infiltration, stream buffers, green infrastructure, and use of low-impact development.
- Structural - management of SW runoff through control structures.

The following BMP's ensure MCM 4.

BMP 4.A. Verify Construction Site SW Runoff Ordinance

Description: EKU will ensure compliance with local ordinance for controlling construction site SW runoff.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>Perform in Permit Year:</u>				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
4.A.1. Identify city ordinance for controlling construction site SW runoff			1				
Obtain copy of ordinance controlling construction site SW runoff. Identify construction site SW control requirements.	Ordinance requirements available	Asst Dir EREM					
4.A.2. Distribute ordinance			1				
Ensure affected departments are aware of city ordinance.	Provide copy of construction site SW runoff control ordinance and summary of requirements to Capital Planning and Facilities Services	Asst Dir EREM					
4.A.3. Modify EKU general conditions of construction			1				
Develop contract language requiring designers to develop and implement SW pollution prevention plans (SWPPPs) and obtain a Notice of Coverage (NOC) from the KY Division of Water if disturbing one acre or more. Develop contract language requiring the operator to conduct inspections according to KYR10 (Kentucky's general permit for construction SW discharges). Contract should also address the proper management of construction site waste.	Contract language revised	Associate Director Capital Planning					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



BMP 4.B. Implement Construction Site SW Runoff Compliance Program

Description: Ensure compliance with local ordinance for construction site SW runoff for projects and construction sites that disturb one or more acres.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
4.B.1. Identify responsible construction plan review staff			1				
Establish who has authority and responsibility within EKU for construction plan review of projects disturbing one acre or more and totaling less than \$600K to affirm compliance with local ordinances and KPDES permit. Projects greater than \$600K are under the purview of the State. Review ordinance and understand requirements to meet KPDES permit. Review plans under EKU control for compliance.	All responsibilities assigned	Asst Dir EREM					
4.B.2. Develop tools and procedures for consistent reviews and inspections			1				
Utilize checklist for approval or rejection of installation and final SW control sign-off to ensure that staff reviews are consistent and thorough, to include the following ten elements: http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=factsheet_results&view=specific&bmp=116 1. Minimize Clearing and Grading 2. Protect Waterways 3. Phase Construction to Limit Soil Exposure 4. Immediately Stabilize Exposed Soils 5. Protect Steep Slopes and Cuts 6. Install Perimeter Controls to Filter Sediments 7. Employ Advanced Sediment Settling Controls 8. Certify and Train Contractors on SW Site Plan Implementation 9. Control Waste at the Construction Site 10. Inspect and Maintain BMP's Determine approval process for construction site SW management inspections.	Checklist developed and approval procedure in place	Asst Dir EREM					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
4.B.3. Conduct construction site inspections			1	2	3	4	5
Perform inspection audits of construction sites on campus disturbing one acre or more and totaling less than \$600K to ensure that the contracted operator is properly performing and documenting inspections. Verify that what is approved on the plans is actually installed and working in the field.			2	3	4	5	
	Inspections completed and documented	Associate Director Capital Planning					

BMP 4.C. Provide Mechanism for Public Reporting of Spills

Description: Develop a mechanism to provide for the public reporting of spills and other discharges. EKU shall keep a record of spill reports received and actions taken and include that information in the annual report.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
4.C.1. Provide for public reporting of spills and other discharges			1				
Implement SW quality hotline for reporting of spills and other discharges. Keep a record of all reports received. Report all incidents to the Director of EH&S and any incidences that may be in violation of local ordinance to EKU Public Safety.							
	Hotline, recording and reporting procedures all in place	Asst Dir EREM					
4.C.2. Ensure review of reports made by the general public			1	2	3	4	5
Develop procedures for the consideration of public inquiries, concerns, and information submitted regarding local construction activities.							
	Documented actions for each report	Director EH&S					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



MCM 5. Post-Construction Stormwater Management

Post-Construction Stormwater Management refers to permanent SW quality management over the life of the property's use for areas of new development and redevelopment in a manner to reduce or mitigate the impact of SW runoff. This is the key element of the NPDES permit and the strategy of the Nation and the Commonwealth for achieving the goals of the Clean Water Act.

The following BMP's ensure MCM 5.

BMP 5.A. Verify Post-Construction SW Runoff Ordinance

Description: EKU will ensure compliance with local ordinance for controlling post-construction SW runoff.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
5.A.1. Identify city ordinance for controlling construction site SW runoff			1				
Obtain copy of ordinance controlling post-construction site SW runoff. Identify post-construction site SW control requirements.	Ordinance requirements available	Asst Dir EREM					
5.A.2. Distribute ordinance			1				
Ensure affected departments are aware of city ordinance.	Copies of post-construction site SW runoff control ordinance and summary of requirements provided to Capital Planning and Facilities Services.	Asst Dir EREM					
5.A.3. Modify EKU general conditions of construction			1				
Develop contract language requiring designers to include SW quality treatment consistent with the City of Richmond ordinance for all new development and redevelopment sites disturbing one acre or more.	Contract language revised	Associate Director Capital Planning					

BMP 5.B. Implement Post-Construction SW Runoff Compliance Program

Description: Ensure compliance with local ordinance for post-construction SW runoff for projects and construction sites that disturb one or more acres.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:	
			<u>1</u>	<u>2</u>
5.B.1. Identify responsible post-construction review staff			1	

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



Establish who has authority and responsibility within EKU for post-construction review of projects totaling less than \$600K to affirm compliance with local ordinances and KPDES permit. Projects greater than \$600K are under the purview of the State. Review ordinance and understand requirements to meet KPDES permit.

All responsibilities assigned

Asst Dir EREM

Perform in
Permit Year:

Item

Measureable Goal

Owner/s

1 2 3 4 5

5.B.2. Develop tools and procedures for consistent reviews and inspections

1

Utilize checklist for approval or rejection of installation and final SW control sign-off to ensure that staff reviews are consistent and thorough. Develop procedures for post-construction SW control review and approval process. Develop a required re-approval process when changes to SW management measures are made.

Checklist developed and approval procedure in place

Asst Dir EREM

5.B.3. Conduct post-construction site inspections

2 3 4 5

Inspect facilities prior to rainfall events, function during rainfall events and the condition after rainfall events. This program will consist of the operator performing inspections of the SW control measures as they are being installed, Capital Planning staff verifying during the inspection audit that they are installed, and a final as-built certification performed by the operator.

Inspections completed and documented

Associate Director Capital Planning

BMP 5.C. Provide Mechanism for Public Reporting of Spills

Description: Develop a mechanism to provide for the public reporting of spills and other discharges. EKU shall keep a record of spill reports received and actions taken and include that information in the annual report.

Perform in
Permit Year:

Item

Measureable Goal

Owner/s

1 2 3 4 5

5.C.1. Provide for public reporting of spills and other discharges

1

Implement SW quality hotline for reporting of spills and other discharges. Keep a record of all reports received. Report all incidents to the Director of EH&S and any incidences that may be in violation of local ordinance to EKU Public Safety.

Hotline, recording and reporting procedures all in place

Asst Dir EREM

5.C.2. Ensure review of reports made by the general public

1 2 3 4 5

Develop procedures for the consideration of public inquiries, concerns, and information submitted regarding local construction activities.

Documented actions for each report

Director EH&S

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



MCM 6. Pollution Prevention & Good Housekeeping

EKU will develop and implement Facilities Services staff training for preventing or reducing pollutant runoff into the storm sewer system from facilities operations, including such items as maintenance and use of fleet vehicles, building maintenance, new construction and land disturbances, SW system maintenance, and grounds maintenance.

The following BMP's ensure MCM 6.

BMP 6.A. Publicize Appropriate Waste Disposal Procedures

Description: Make information available on recycling programs for commonly dumped wastes, such as motor oil and antifreeze, and appropriate disposal procedures for items such as paint and pesticides.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>Perform in Permit Year:</u>
			<u>1</u> <u>2</u> <u>3</u> <u>4</u> <u>5</u>
6.A.1. Identify and make available proper waste disposal procedures			1
Determine proper disposal procedures for common SW pollutants and publicize. Obtain and/or prepare procedures and distribute to Facilities Services staff.	Procedures provided	Director EH&S	

BMP 6.B. Maintain Campus SW Inventory

Description: Include an inventory of campus SW facilities, maintenance activities and schedules affecting SW quality, and annual SW infrastructure inspection schedules.

Incorporate procedures for properly disposing of waste removed from SW sewers.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>Perform in Permit Year:</u>
			<u>1</u> <u>2</u> <u>3</u> <u>4</u> <u>5</u>
6.B.1. Perform campus SW inventory and inspection			
Inventory and inspect campus facilities and operations to identify risks associated with pollutant exposure or introduction into the SW sewer system. Target inspecting 20% of campus SW infrastructure annually and focus attention first on areas deemed a priority, based on the field assessment. Document inspection, including site description, materials stored near site, pollutant exposure or introduction risks, maintenance actions, corrective measures and any follow-up inspections.	Inspection completed and documented	Director EH&S	

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



BMP 6.C. Develop and Distribute a SW Training Program

Description: Provide training program for preventing or reducing pollution in campus runoff.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
6.C.1. Develop staff training program			2				
Develop a program for Facilities Services employee training for preventing or reducing SW pollution during normal operations, including procedures for properly disposing of wastes. Instruction to be provided for periodic inspection of campus outflows incorporating management practices that will minimize the escape of pollutants from campus.	Procedures provided	Director EH&S					
6.C.2. Determine training methods			2				
Determine the most effective means to train employees on procedures for protecting water quality. Tailor messages and delivery methods for maximum effectiveness (e.g. - field staff may be best suited for hands on training in the field during infrastructure repair and/or normal maintenance activities).	Method/s selected	Asst Dir EREM					
6.C.3. Distribute training materials			2 3 4 5				
Once developed, make materials available to affected parties. Provide copies of outflow locations and associated management practices to Facilities Services managers and supervisors.	Materials distributed	Asst Dir EREM					

BMP 6.D. Provide SW Training

Description: Develop and deliver employee training to prevent and reduce SW pollution.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
6.D.1. Establish employee training schedule			2 3 4 5				
Schedule annual training dates and attendance requirements. From the topics identified, select dates and employees required to attend the identified sessions.	Schedule complete	Asst Dir EREM					
6.D.2. Conduct employee training			2 3 4 5				
Conduct training session such that employees involved in SW activities receive a minimum of one training per year.	<ul style="list-style-type: none"> Number of trainings provided Number of persons trained 	Director EH&S					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



BMP 6.F. Track Implementation

Description: Track pollution prevention and good housekeeping initiatives and activities and provide measures in the annual report.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
6.F.1. Track annual activities			1	2	3	4	5
Maintain a record of all activities to meet annual reporting needs in a spreadsheet.	Spreadsheet completed on common SWQMP format	Asst Dir EREM					
6.F.2. Provide fiscal record			2	3	4	5	
Tally total expenses for the previous 12 months of the permit period.	Spreadsheet completed on common SWQMP format and sent to Asst Dir EREM	Director EH&S					
6.F.3. Provide budget projection			1	2	3	4	5
Project budget requirements and any additional resources required for Pollution Prevention & Good Housekeeping for the next year of the permit.	Spreadsheet completed on common SWQMP format and sent to Asst Dir EREM	Director EH&S					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



7. Future Water Quality Monitoring Program

EKU will develop an appropriate monitoring program that evaluates the effectiveness of the SWQMP and provides feedback to change or improve the program to the extent practical. Monitoring will be implemented in the next permit period.

The following BMP's ensure MCM 7.

**Perform in
Permit Year:**
1 2 3 4 5

4

7.A. Select BMP Monitoring Program Strategy

Description: Select from among the available options for developing a monitoring program for the next permit cycle including:

Option A - Effluent monitoring of pollutants and conditions of concern at selected outfalls that are representative of particular land uses or geographical areas that contribute to pollutant loading before and after implementation of SW control measures.

Option B - Monitoring of pollutants and conditions of concern in receiving waterbodies, both upstream and downstream of MS4 discharges, over an extended period of time.

Option C - In-stream biological monitoring at appropriate locations to demonstrate the recovery of biological communities after implementation of SW control measures.

Option D - Monitoring of other parameters or conditions that provides a measure of the effectiveness of the SW quality management program.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>
Research available options and select appropriate strategy.	Strategy selected	Director EH&S

7.B. Determine Monitoring Locations

4

Description: Based on the selected monitoring option, determine the most appropriate monitoring locations and/or locating strategy.

Locations may be static or dynamic based on the chosen methods of monitoring. Evaluate the intent and merits of selected method and establish system.	Locations selected	Director EH&S
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7.C. Determine Sampling Parameters

4

Description: Based on the selected monitoring option, determine the most appropriate monitoring parameters.

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



**Perform in
Permit Year:**

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
Consider available sampling and testing resources (water, sewer, other) when selecting parameters. Also consider monetary and manpower requirements and available budget.	Sampling parameters selected	Director EH&S					

7.D. Determine Sampling/Monitoring Frequencies

4

Description: Based on the selected monitoring option and parameters, determine the most appropriate monitoring and/or sampling frequency.

Consider available sampling and testing resources (water, sewer, other) and standard of care (chain of custody) when selecting frequency. Also consider monetary and manpower requirements and available budget.	Frequencies selected	Director EH&S					
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7.E. Project Budget

4

Description: Determine budgetary requirements for water quality monitoring.

Project resource and budget requirements for the water quality monitoring program.	Spreadsheet completed on common SWQMP format and sent to Asst Dir EREM	Director EH&S					
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STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



8. Funding

Funding shall be established and maintained to ensure the accomplishment of the activities required by this SWQMP.

The following plan is intended to provide the required funding.

8.A. Develop Budget

Description: Project all required expenses.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:					
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	
8.A.1. Provide spreadsheet format for SWQMP fiscal tracking and budget projections			1					
Develop common format for fiscal tracking and budget input that can readily be combined in a single spreadsheet.	Format provided to ECRES Chair and Director EH&S	Asst Dir EREM						
8.A.2. Determine SW infrastructure maintenance requirements			2	3	4	5		
Develop a list of capital projects and their projected costs. Determine annual costs of maintenance and repair.	Spreadsheet completed on common SWQMP format	Asst Dir EREM						
8.A.3. Determine M&O of equipment dedicated to SW operations			2	3	4	5		
Develop a list of new equipment required, including the projected annual costs for maintenance and replacement.	Spreadsheet completed on common SWQMP format	Asst Dir EREM						
8.A.4. Total the expenses and budget projections for all MCM's			2	3	4	5		
Assemble previous year dollar figures and next year projections of expenses, including required staffing, to perform planned MCM's during the following permit year. Include in budget consistent recurring annual amounts over a number of years to cover large expenses like capital projects and new equipment.	SWQMP budget spreadsheet complete and available	Asst Dir EREM						

8.B. Obtain Funding

Description: Obtain commitment for all required funding.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:					
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	
8.B.1. Explore ways to fund the SWQMP			2	3	4	5		
Consider potential ways of assessing SW fees or other methods of funding the annual SWQMP	Fees or other methods of raising funds	ECRES						

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



expense. Propose fee plans to university administration and obtain approval. Implement fund raising activities.

implemented

Perform in
Permit Year:

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
8.B.2. Request obligation of funds for the upcoming fiscal year							
Request full funding to meet the identified fiscal obligation. Adjust MCM's as required to accommodate available funding.	Required funds itemized in projected departmental budgets for the next fiscal year with a list of activities planned that matches the committed funding.	ECRES Chair, Director EH&S & Asst Dir EREM		2	3	4	5

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



9. Annual Report

EKU will submit an Annual Report summarizing activities and results for each permit year of the SWQMP.

The Annual Report shall include a certification by a responsible university official that the information contained therein is true, accurate, and complete.

The Annual Report will be available on the shared “N” drive maintained by EKU ITDS and hardcopy will be made available to appropriate officials on request.

9.A. Report Results of Measureable Goals

Description: Document results from measured goals verifying that BMP activities were conducted.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
9.A.1. Receive inputs				2	3	4	5
Each owner of SWQMP BMP’s is to provide required input no later than 30 days after the end of each permit year.	Activities spreadsheets on common SWQMP format received and/or completed	ECRES Chair, Director EH&S, Asst Dir EREM					
9.A.2. Compile results				2	3	4	5
Combine inputs in single spreadsheet documenting measured outcomes for all MCM’s.	Spreadsheet completed	Asst Dir EREM					

9.B. Report Any Discharges or Spills

Description: Include list of all illicit discharges or spills and remediation performed.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
9.B.1. Obtain inputs			1	2	3	4	5
Retrieve all reported actions taken for each illicit discharge or spill reported to the Hotline.	Documented actions for discharges or spills current and available	Asst Dir EREM					
9.B.2. Provide list of discharges or spills			1	2	3	4	5
Compile list of discharges or spills and actions taken.	Record of discharges and spills included in annual report	Asst Dir EREM					

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



9.C. Provide Overall Program Review

Description: Include a qualitative evaluation of the effectiveness of the BMP's in accomplishing the MCM's, an assessment of the perceived benefits to the campus community and the changes that will be made in the program for the succeeding year.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
9.C.1. Receive inputs							
Annual ECRES reviews of Public Education and Outreach, Public Involvement and Participation and IDDE Programs provided no later than 30 days after the end of each permit year.	Summaries sent to Asst Dir EREM	ECRES Chair		2	3	4	5
9.C.2. Summarize							
Compose summary of all MCM's.	Summary complete	Asst Dir EREM		2	3	4	5

9.D. Report Expenses and Budget

Description: Include previous permit year expenses and resource requirements, as well as projections for the upcoming permit year.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
9.D.1. Document fiscal results							
Itemize previous permit year's expenses to perform planned MCM's.	Expenses itemized	Asst Dir EREM		2	3	4	5
9.D.2. Provide budget projection							
Include budget for the next permit year for performing the planned MCM's, including any additional staffing requirements.	Approved SWQMP budget for upcoming permit year included in report	Asst Dir EREM		2	3	4	5

9.E. Submit Annual Report to the Kentucky Department of Water

Description: Include previous permit year expenses and resource requirements, as well as projections for the upcoming permit year.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
9.E.1. Complete annual report							
Compile measurements of completed activities, record of discharges or spills, assessment of	Annual report completed	Asst Dir EREM	1	2	3	4	5

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



program effectiveness, planned changes, total expenses and a budget projection for the next permit year into the annual report.

<u>Item</u>	<u>Measureable Goal</u>	<u>Owner/s</u>	Perform in Permit Year:				
			<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
9.E.2. Obtain approvals			1	2	3	4	5
Obtain signatures from ECRES Chair, Director EH&S, Asst Dir EREM and Director Facilities Service.	Sign-offs obtained	Asst Dir EREM					
9.E.3. Submit annual report			1	2	3	4	5
Submit Annual Report to the KDOW Surface Water Permits Branch no later than 60 days after the end of each permit year.	Report submitted within 60 days of the end of the permit year	Asst Dir EREM					
9.E.4. Archive on the “N” drive			1	2	3	4	5
Place electronic copy of signed annual report on the “N” drive.	Report archived	Asst Dir EREM					

**STORMWATER QUALITY
MANAGEMENT PLAN**
EASTERN KENTUCKY UNIVERSITY



10. Affirmation of Ownership

The signees below affirm that they have participated in the preparation of this SWQMP and are in concurrence with the assigned responsibilities as listed. As the principal owners, these persons accept primary responsibility for overseeing the completion of the requisite BMP's for each of the MCM's and providing annual results for the designated measureable goals.

Owner Signature

Date

Alice Jones; Director, ECU Environmental Research Center and Chair, ECU
Committee for Environmental Stewardship (ECRES)

Name; Title

Owner Signature

Date

Bryan Makinen; Director, ECU Environmental Health and Safety

Name; Title

Owner Signature

Date

Bill Rhodes; Assistant Director, Environmental Resources and Energy Management

Name; Title