STORMWATER QUALITY MANAGEMENT PLAN

2014-2019

Eastern Kentucky University

Environmental Resources & Energy Management

Facilities Services





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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 distrubed
- 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

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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

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

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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.

| | | | Perform in Permit Year: |
|---|---|---|----------------------------|
| ltem | Measureable Goal | Owner/s | <u>1 2 3 4 5</u> |
| 1.A.1. Engage the EKU Committee for Responsible | e Environmental Steward | dship | 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 Mgmnt (EREM) | |
| 1.A.2. Develop and/or select education materials a | 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 ec | lucation 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 | |

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

BMP 1.B. Conduct Public Outreach Activities

Provide a budget projection for the next year,

including funding sources.

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.

| | | | Perform in Permit Year: |
|--|--|---|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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 ou | itreach 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. | Annual review held and results sent to Asst Dir EREM | ECRES Chair | |

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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.

| | | | Perform in Permit Year: |
|---|---|----------------|----------------------------|
| Item | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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 EKU. 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 | |

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

| literer | Maaauraahia Caal | Quantar/a | Perform in Permit Year: |
|---|--|----------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 5</u> |
| 2.A.6. Conduct annual public involvement and vol | unteer activities | | 2 3 4 5 |
| 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.A.7. Establish means to measure activities | | | 2 3 4 5 |
| 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.A.8. Conduct annual review and evaluation of pr | rogram | | 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 activities were sufficient and | Annual review held and results sent to Asst Dir EREM | ECRES Chair | |

BMP 2.B. Track Implementation

if the message was successfully received. Determine changes that need to be made.

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.

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

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

format and sent to Asst Dir EREM

| | | | Permit Year: |
|--|---|----------------|------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 5</u> |
| 2.B.2. Provide fiscal record for each activity cond | lucted | | 2345 |
| 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.B.3. Provide budget projection | | | 1 2 3 4 5 |
| 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 | |



Perform in



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MCM 3. Illicit Discharge Detection and Elimination

Recognizing the adverse effects illicit discharges can have on receiving waters, EKU 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: EKU will ensure compliance with local ordinance that prohibits illicit discharges to the storm sewer.

| | | | Perform in Permit Year: | | - | | |
|--|--|----------------|----------------------------|----------|----------|----------|----------|
| Item | Measureable Goal | <u>Owner/s</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 d | lischarges | | 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.

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| | | | Perform in Permit Year: |
|--|---|-------------------------------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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 Servic | es 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 s | source removal | | 2 |
| Develop or modify procedures for removing an illicit discharge when appropriate or required. Procedures shall include: 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 | |

requirements.

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| | | | Perform in Permit Year: |
|--|--|----------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 5</u> |
| 3.B.6. Conduct annual review and evaluation of the | ne IDDE program | | 2 3 4 5 |
| 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 | |
| 3.B.7. Revise and Implement updated IDDE progr | am | | 2 3 4 5 |
| 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 | Revisions implemented | ECRES | |

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: |
|--|--|----------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 5</u> |
| 3.C.1. Perform mass distribution of educational m | aterials | | 2 3 4 5 |
| Conduct at least one activity associated with a mass distribution of core SW program information to all individuals in the campus community. | Number of students, faculty and staff receiving the illicit discharge information Number of illicit discharge reports | ECRES | |
| 3.C.2. Conduct facilities staff training | | | 1 2 3 4 5 |
| Hold one (1) employee training on the hazards associated with illegal discharges and improper disposal of waste. | Number of persons trained | Director EH&S | |

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 •

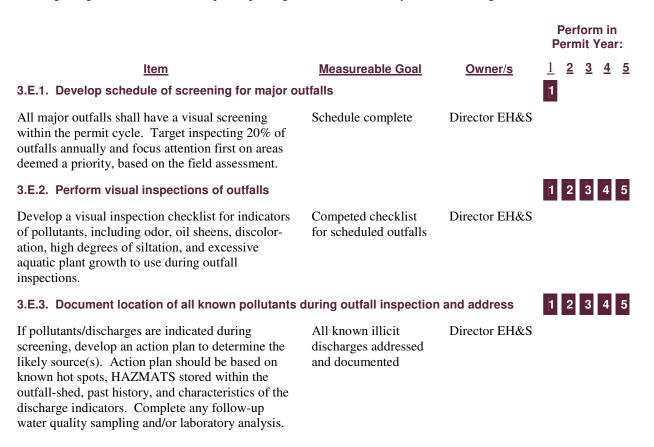
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| | | | - | | orn it Y | | | |
|---|---------------------------------------|----------------|----------|---|-------------|----------|----------|--|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1</u> | 2 | <u>3</u> | <u>4</u> | <u>5</u> | |
| 3.D.1. 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.



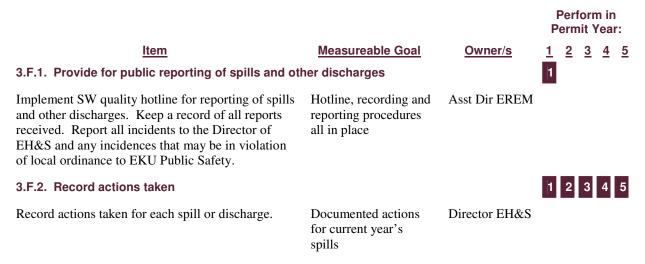
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BMP 3.F. Provide Mechanism for Public Reporting of Spills

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.



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.

| | | | Perform in Permit Year: |
|--|--|----------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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 pro | cedures 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 | |

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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.

| | | | Perform in Permit Year: |
|--|--|-------------------------------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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 condu | ucted | | 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.

| | | | Perform in Permit Year: |
|--|--|---|----------------------------|
| Item | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 5</u> |
| 4.A.1. Identify city ordinance for controlling constr | ruction 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 construct | ion | | Ĩ |
| 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



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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.

| | | | Perform in Permit Year: |
|---|---|----------------|----------------------------|
| Item | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 5</u> |
| 4.B.1. Identify responsible construction plan revi | ew 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 consiste | ent reviews and inspect | ions | 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/menuofbm ps/index.cfm?action=factsheet_results&view=specific&bmp=116) Minimize Clearing and Grading Protect Waterways Phase Construction to Limit Soil Exposure Immediately Stabilize Exposed Soils Protect Steep Slopes and Cuts Install Perimeter Controls to Filter Sediments Employ Advanced Sediment Settling Controls Certify and Train Contractors on SW Site Plan Implementation Control Waste at the Construction Site 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



Dorform in

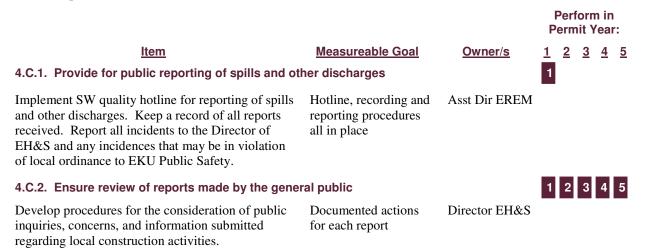
EASTERN KENTUCKY UNIVERSITY

| | | | Permit Year: |
|--|---|---|------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 5</u> |
| 4.B.3. Conduct construction site inspections | | | 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 | Inspections completed and documented | Associate Director Capital Planning | |

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

plans is actually installed and working in the field.

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.



STORMWATER QUALITY MANAGEMENT PLAN



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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.

| | | | - | erfo rmi | | | |
|---|--|---|----------|-------------|----------|----------|----------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1</u> | 2 | <u>3</u> | <u>4</u> | <u>5</u> |
| 5.A.1. Identify city ordinance for controlling constr | uction 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 construct | ion | | 1 | | | | |
| Develop contract language requiring designers to include SW quality treatment consistent with the City of Richmond ordinance for all new develop- ment 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.



Establish who has authority and responsibility

within EKU for post-construction review of

projects totaling less than \$600K to affirm

STORMWATER QUALITY **MANAGEMENT PLAN**



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assigned

All responsibilities

Asst Dir EREM

| 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. | | | | |
|---|--|---|---------------------------|----------|
| 1 1 | | | Perform in Permit Year | |
| ltem | Measureable Goal | <u>Owner/s</u> | | <u>5</u> |
| 5.B.2. Develop tools and procedures for consiste | ent reviews and inspection | ons | 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 inspection | S | | 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 Re | eporting of Spills | | | |
| Description: Develop a mechanism to provide EKU shall keep a record of spill reports received | | - | - | |
| annual report. | | | Perform in Permit Yea | |
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4</u> | <u>5</u> |
| 5.C.1. Provide for public reporting of spills and o | ther 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 gene | eral 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 | | |
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STORMWATER QUALITY MANAGEMENT PLAN



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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.

| | | | - | | orn it Y | | - |
|--|---------------------|----------------|----------|----------|-------------|----------|----------|
| ltem | Measureable Goal | <u>Owner/s</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 di | sposal 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.

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 Director EH&S and documented



STORMWATER QUALITY MANAGEMENT PLAN



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

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

| | | | Perform in Permit Year: |
|--|-----------------------|----------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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 | | | 2345 |
| 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.

| | | | Perform in Permit Year: |
|---|---|----------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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. | Number of trainings provided Number of persons trained | Director EH&S | |

STORMWATER QUALITY MANAGEMENT PLAN



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BMP 6.F. Track Implementation

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

| | | | Perform in Permit Year: |
|---|---|----------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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



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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.



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.

| ltem | Measureable Goal | Owner/s |
|---|-------------------|---------------|
| Research available options and select appropriate strategy. | Strategy selected | Director EH&S |

7.B. Determine Monitoring Locations

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

Locations selected

Director EH&S

Locations may be static or dynamic based on the chosen methods of monitoring. Evaluate the intent and merits of selected method and establish system.

7.C. Determine Sampling Parameters

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

4

4

STORMWATER QUALITY MANAGEMENT PLAN

EASTERN KENTUCKY UNIVERSITY



4

Director EH&S

Perform in

| | | | Pern | nit Ye | ear: | |
|--|------------------------------|----------------|------------|------------|------------|--|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1</u> 2 | <u>3</u> 4 | <u>4 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

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

Asst Dir EREM

Consider available sampling and testing resources Frequencies selected (water, sewer, other) and standard of care (chain of custody) when selecting frequency. Also consider monetary and manpower requirements and available budget.

7.E. Project Budget

Description: Determine budgetary requirements for water quality monitoring.

Project resource and budget requirements for the water quality monitoring program. Spreadsheet completed Director EH&S on common SWQMP format and sent to

STORMWATER QUALITY MANAGEMENT PLAN



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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.

| | | | Perform in Permit Year: |
|--|--|----------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 5</u> |
| 8.A.1. Provide spreadsheet format for SWQMP fis | cal 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 require | ed funding. | | |
| | | | Perform in Permit Year: |

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

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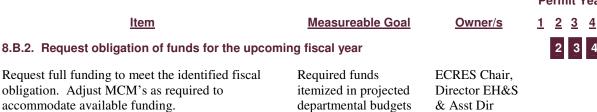
expense. Propose fee plans to university administration and obtain approval. Implement fund raising activities.

implemented

for the next fiscal year

with a list of activities planned that matches the committed funding.

EREM





Perform in

STORMWATER QUALITY MANAGEMENT PLAN



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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.

| | | | Perform in Permit Year: |
|---|---|---|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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.

| | | | Permit Year: |
|--|---|----------------|------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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 | |

Perform in

STORMWATER QUALITY MANAGEMENT PLAN



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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.

| | | | Permit Year: |
|--|------------------------------------|---------------|--|
| Item | Measureable Goal | Owner/s | <u>1</u> <u>2</u> <u>3</u> <u>4</u> <u>5</u> |
| 9.C.1. Receive inputs | | | 2 3 4 5 |
| 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 | |
| 9.C.2. Summarize | | | 2 3 4 5 |
| Compose summary of all MCM's. | Summary complete | Asst Dir EREM | |

9.D. Report Expenses and Budget

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

| | | | Perform in Permit Year: |
|---|--|----------------|----------------------------|
| Item | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 5</u> |
| 9.D.1. Document fiscal results | | | 2 3 4 5 |
| Itemize previous permit year's expenses to perform planned MCM's. | Expenses itemized | Asst Dir EREM | |
| 9.D.2. Provide budget projection | | | 2 3 4 5 |
| 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 | |

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.

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

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

| | | | Perform in Permit Year: |
|--|---|----------------|----------------------------|
| ltem | Measureable Goal | <u>Owner/s</u> | <u>1 2 3 4 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, EKU Environmental Research Center and | Chair, EKU |
| Committee for Environmental Stewardship (ECRES) | |
| Name; Title | |

Owner Signature

| Bryan Makinen; | Director, | EKU Er | nvironme | ental He | ealth an | d Safety |
|----------------|-----------|--------|----------|----------|----------|----------|
| Name; Title | | | | | | |

Owner Signature

Date

Date

Bill Rhodes; Assistant Director, Environmental Resources and Energy Management Name; Title