

**Johnson County, Kansas
Stormwater Management Plan
January 1, 2014 through January 31, 2019**



Federal Permit No. KSR41007

Submitted in Compliance with Kansas Permit No. M-KS52-SU02

Date: **February 1, 2015**

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Attachments

Attachment 1 – Map of Permitted Area and TMDL Monitoring Locations

1.1 INTRODUCTION

This document is a Stormwater Management Plan (SMP, or the “Plan”) created to help reduce the discharge of pollutants in stormwater runoff within regulated areas of the unincorporated area of Johnson County, Kansas. It outlines stormwater program activities, monitoring requirements, reporting requirements, and responsible parties for implementing this work.

This plan was prepared in compliance with Kansas Permit Number: M-KS52-SU02

Effective Date: February 1, 2014

Expiration Date: January 31, 2019

Section 1.2 summarizes the basic requirements of the stormwater permitting program for the benefit of users of this document. Subsequent sections provide the details of the SMP itself.

1.2 OVERVIEW OF STORMWATER PERMIT REQUIREMENTS FOR MS4s

The Federal Water Pollution Control Act (also referred to as the Clean Water Act) requires permits of both municipal and industrial stormwater dischargers, developed under a program called the National Pollutant Discharge Elimination System (NPDES). Permits for stormwater discharges from municipal urbanized areas are regulated under the MS4 permitting program. The term MS4 is short for **M**unicipal **S**eparate **S**torm **S**ewer **S**ystems. (These are urbanized areas that have stormwater drainage systems that are separate from sanitary sewer systems.)

The Kansas Department of Health and Environment (KDHE) has developed two general MS4 permits for small municipalities with separate storm sewer systems. One was written for entities receiving an MS4 permit for the first time and another written for entities receiving a re-issued permit.

The general permits establish standardized requirements for entities across the state engaged in similar activities and discharging stormwater of similar quality. Permits issued to regulated cities or counties may include added conditions in addition to the standardized requirements in the general permits. The following description of the MS4 permit program was compiled from KDHE fact sheets:

The small MS4 general permit program addresses MS4s that generally serve populations less than 100,000 in urbanized areas, plus those MS4s located outside of urbanized areas that have or may have the potential to negatively impact surface water quality as a result of their discharges.

A general permit requires the permittee to develop, implement, and enforce a Stormwater Management Plan (SMP) designed to reduce the discharge of pollutants from the MS4 to the maximum extent practical, to protect water quality, and to satisfy water quality requirements of the Clean Water Act and Kansas law.

The SMP must include six minimum stormwater control measures that are required of all plans. It is also required to address implementation of Best Management Practices (BMPs) for reducing pollutants in stormwater discharges from the municipality. Special emphasis is placed on drainage basins and stormwater pollutants that discharge to designated Total Maximum Daily Load (TMDL) streams and lakes within or immediately downstream of the municipality.

The SMP document must address the BMPs to be implemented by the permittee, provide measurable goals for the BMPs, designate the parties responsible for implementing the control

measures, provide appropriate maps and conduct stormwater/receiving stream sampling and testing based upon the TMDL impairments.

“Impaired Waters” are streams or lakes that do not attain or maintain minimum water quality standards. They may result from individual or multiple pollutants. As noted above, TMDL is an acronym for **T**otal **M**aximum **D**aily **L**oad, which is a calculation of the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards. Impaired streams and lakes are also commonly referred to as TMDL water bodies.

TMDL water bodies and pollutants of concern are identified in permits issued for individual municipalities if impaired waters exist within or immediately downstream of that jurisdiction. Monitoring requirements and water quality protection initiatives may then focus especially on those pollutants.

SECTION TWO

Parties Responsible For Compliance With This Plan

Overall responsibility for coordination of activities outlined in this Plan, and for reporting will be by the Johnson County Public Works Department, Urban Services Division compiling information and Public Works Director or his designee signing and submitting all documents (Stormwater Management Plan (and updates) and Annual Report) to KDHE.

This section describes the six minimum water quality protection control measures that are required by all MS4 permits. They include the following:

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

For each of these control measures the following is provided in this section:

- A summary description of the control measure
- The benefits of the control measure
- A table listing Best Management Practices (BMPs), Measurable goals for the BMPs, and Responsible parties
- Program assessment activities for evaluating the success of the control measure

3.1 CONTROL MEASURE 1 - PUBLIC EDUCATION AND OUTREACH

Description

This minimum control consists of implementing a public education program to inform individuals, businesses, and organizations about the impacts of stormwater discharges on surface water quality and how they can help reduce pollutants in stormwater runoff. This may include distribution of educational materials to the community and/or conducting outreach activities.

Benefit

An informed public increases awareness of water quality issues in both residents and businesses, creates opportunities for the public to take direct action to improve the health and sustainability of their community, and builds support for program goals making initiatives more effective.

BMPs, Goals, and Staff

Public Education and Outreach				
BMP	BMP Description	Measurable Goal	Lead Staff	Schedule
1.1 Public Education and Outreach	Develop and distribute educational materials and participate in activities related to improving stormwater quality.	Number of people reached	Water Quality Specialist, Public Works (PWKS)	Permit year 2, 3,4,5

SECTION THREE

Six Minimum Control Measures

Public Education and Outreach				
BMP	BMP Description	Measurable Goal	Lead Staff	Schedule
1.2 Website**	Maintain and update JCSMP website with educational information or links to Stormwater pollution prevention topics	Website updated and documentation of visitors and activity	Water Quality Specialist, PWKS	Permit years 1,2,3,4,5
1.3 Support stormwater initiatives in schools and community**	Efforts may include partnering with schools and local non-profit organizations to implement stormwater education in schools and the community.	Number of school children (k-12) and number of adults that received education.	Water Quality Specialist, PWKS	Permit years 2,3,4,5
1.4 Citizen awareness survey**	Conduct survey of citizens to determine awareness of stormwater quality issues, target education and measure program effectiveness.	Level of public awareness on general stormwater quality issues	Water Quality Specialist, PWKS	Permit years 2 and 5
1.5 Annual Program Review	Assess Stormwater Management Program and revise as needed	Annual Report and revised Stormwater Management Plan completed (if necessary) completed and submitted to KDHE	Urban Services Division, PWKS	Permit years 1,2,3,4,5
** BMP is voluntary and will be accomplished as funding and opportunities allow.				

Program Assessment

The overall success of the Public Education and Outreach Program will be measured through the successful implementation of the components of the program. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. Success will also be measured specifically by the following:

- Number of city and partner publications
- Social media metrics
- Survey results (conducted by partner organizations)

3.2 CONTROL MEASURE 2 - PUBLIC INVOLVEMENT AND PARTICIPATION

Description

This minimum control consists of creating opportunities for individuals and organizations to provide public comment and recommendations regarding BMPs and measurable goals, and participate in the development and implementation of BMPs to reduce the contamination of stormwater. This program must also comply with state and local public notice requirements.

Benefit

The goal of the stormwater management plan is to improve water quality in local lakes and rivers, which provides benefits to the entire community. As such, the community deserves to have an opportunity to voice opinions on the content of the plan. Further, input into decisions builds support for and ownership in outcomes.

BMPs, Goals, and Staff

Public Involvement and Participation				
BMP	BMP Description	Measurable Goal	Lead Staff	Schedule
2.1 BMP Cost Share Program for Homeowners**	Participate in Johnson County SMP BMP Cost Share Program	Number and types of BMPs installed.	Water Quality Specialist, PWKS	Permit years 1,2,3,4,5
2.2 Mechanism for Citizen Participation	Provide mechanism on website for citizen comments on stormwater management program	Mechanism to provide comments on-line; log of comments and track responses and actions	Water Quality Specialist, PWKS	Permit years 1,2,3,4,5
2.3 Comply with Public Notice Provision	Advertise revisions of Stormwater Management Plan on county website to provide for the opportunity for public input and provide feedback to comments	Revisions advertised, comments addressed	Water Quality Specialist, PWKS	Permit years 1,2,3,4,5
2.4 Annual Program Review	Assess Stormwater Management Program and revise as required	Annual Report and revised Stormwater Management Plan completed (if necessary) completed and submitted to KDHE	Urban Services Division, PWKS	Permit years 1,2,3,4,5
** BMP is voluntary and will be accomplished as funding and opportunities allow.				

Program Assessment

Similar to Public Education and Outreach, the overall success of the Public Involvement and Participation Program will be measured through the successful implementation of the components of the program. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. Success will also be measured specifically by the following:

- Number of public notices issued and comments received

3.3 CONTROL MEASURE 3 - ILLICIT DISCHARGE DETECTION AND ELIMINATION

Description

This minimum control consists of developing, implementing, and enforcing a program to detect and eliminate illicit wastewater discharges or other non-stormwater discharges into the storm sewer system. KDHE requires this program to include, at a minimum:

- Developing a storm sewer system map of the permitted MS4 showing the location of all outfalls, either pipes or open channel drainage, and showing the names and locations of all streams or lakes that receive discharges from those outfalls.
- Enacting and enforcing an ordinance or resolutions to prohibit non-stormwater discharges into the storm sewer system. Johnson County passed a pollution prevention resolution (Resolution no. 094-06) in September 2006 to regulate unlawful discharges into streams and the storm drain system.
- Informing public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- Developing and implementing a plan to detect and address prohibited non-stormwater discharges.

Benefit

Direct discharges of waste streams can present significant localized impacts to both public health and the environment. Developing legal, technical, and educational means to eliminate illicit discharges provides direct benefits to water quality, the environment, and public health.

BMPs, Goals, and Staff

Illicit Discharge Detection and Elimination				
BMP	BMP Description	Measurable Goal	Lead Staff	Schedule
3.1 Implement a plan to detect and eliminate illicit discharges	Investigate reports of illicit discharge in unincorporated Johnson County	Number of reports received, the disposition of the problem found, and conclusion to the case.	Johnson County Department of Health and Environment	Permit years 1,2,3,4,5
	Dry weather outfall inspection	Number of outfalls inspected	Johnson County Department of Health and Environment	Permit years 1,2,3,4,5

SECTION THREE

Six Minimum Control Measures

Illicit Discharge Detection and Elimination				
BMP	BMP Description	Measurable Goal	Lead Staff	Schedule
	Conduct training for appropriate county staff on IDDE.	Number of Staff Trained	Johnson County Department of Health and Environment	Permit years 1,2,3,4,5
	Update storm sewer map as necessary to show additional pipe network and outfalls.	Updated Map	Johnson County IT, AIMS department	Permit years 1,2,3,4,5 (as needed)
3.2 Household Hazardous Waste (HHW) Program**	Provide Johnson County residents the opportunity to properly dispose of HHW	Number of participants and summary of materials received	Johnson County Department of Health and Environment	Permit years 1,2,3,4,5
3.3 On-Site Sewer System Inspection Program**	Perform inspection and permit of on-site residential septic systems at construction and resale of property. Inspections may also be conducted as a result of complaints and repair requests.	Summary of inspections performed and required compliance actions taken at resale, permits issued	Johnson County Department of Health and Environment	Permit years 1,2,3,4,5
3.9 Annual Program Review	Assess Stormwater Management Program and revise as required	Annual Report and revised Stormwater Management Plan completed (if necessary) completed and submitted to KDHE	JCSMP, PWKS	Permit years 1,2,3,4,5
** BMP is voluntary and will be accomplished as funding and opportunities allow.				

Program Assessment

The overall success of the Illicit Discharge Detection and Elimination Program will be measured through the successful implementation and enforcement of the Stormwater Pollution Prevention Regulations for Unincorporated Area of Johnson County, 2006 edition, Resolution no. 094-06. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. Success will also be measured by the following:

- Number of public complaints addressed or problems discovered
- Number of inspections conducted
- Number of notices of violation or penalties issued

3.4 CONTROL MEASURE 4 - CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Description

This minimum control includes developing, implementing, and enforcing a program to reduce pollutants in any stormwater runoff to the MS4 for construction sites disturbing one acre or more, including areas that are less than one acre but are part of a larger common plan for development that disturbs one or more acre. KDHE requires this program to include:

- Where permittees have the authority to do so, ordinances or resolutions shall be enacted to require erosion and sediment controls, as well as sanctions to ensure compliance. Johnson County passed an erosion and sediment control resolution (Resolution no. 068-08) in January 2009 to regulate runoff pollution from active construction sites disturbing more than one acre.
- Requirements for construction site owners or operators to implement erosion and sediment control BMPs.
- Requirements for construction site owners or operators to control wastes at the construction site that are likely to cause adverse impacts to water quality.
- Procedures for site plan review which incorporate consideration of potential water quality impacts.
- Procedures for receipt and consideration of information submitted by the public.
- Procedures for site inspection and enforcement of control measures.

Benefit

If uncontrolled, land disturbance activities can generate significant loads of sediment which can impact both adjoining properties and downstream water bodies. Fortunately, effective controls are easy and cost-effective to implement.

BMPs, Goals, and Staff

Construction Site Stormwater Runoff Control				
BMP	BMP Description	Measurable Goal	Lead Staff	Schedule
4.1 Enforce Erosion and Sediment Control Regulations	Review all erosion and sediment control plans for compliance with regulations and specifications.	Number of Plans Reviewed	Urban Services Division, PWKS	Permit years 1,2,3,4,5
	Perform pre-construction meetings to review plans and verify installation of perimeter controls.	Number of Pre-construction meetings	Urban Services Division, PWKS	Permit years 1,2,3,4,5

SECTION THREE

Six Minimum Control Measures

Construction Site Stormwater Runoff Control				
BMP	BMP Description	Measurable Goal	Lead Staff	Schedule
	Issue permits prior to any land disturbance activities.	Number of Permits Issued	Urban Services Division, PWKS	Permit years 1,2,3,4,5
	Track construction site inspections, complaints, violations, and enforcement measures	Number of inspections, complaints, violations, enforcement measures	Urban Services Division, PWKS	Permit years 1,2,3,4,5
	Perform final inspection to verify that site is in compliance prior to issuing termination.	Number of final inspections	Urban Services Division, PWKS	Permit years 1,2,3,4,5
4.2 Receipt of Public Information on Construction Site Compliance	Track information received from public	Summary of information received and actions taken.	Urban Services Division, PWKS	Permit years 1,2,3,4,5
4.5 Training and Education**	Provide classroom and field training for staff and contractors.	Track number of training opportunities and number of participants.	Urban Services Division, PWKS	As opportunities arise
4.6 Annual Program Review	Assess Stormwater Management Program and revise as required	Annual Report and revised Stormwater Management Plan completed (if necessary) completed and submitted to KDHE	Urban Services Division, PWKS	Permit years 1,2,3,4,5
** BMP is voluntary and will be accomplished as funding and opportunities allow.				

Program Assessment

The overall success of the Construction Site Stormwater Runoff Control Program will be measured through the successful implementation and enforcement of the Erosion and Sediment Control Regulations Res. 068-08 adopted in 2008. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. Success will also be measured by the:

- Number of plans reviewed
- Number of inspections conducted
- Number of NOVs issued
- Number and amount of penalties issued

3.5 CONTROL MEASURE 5 - POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

Description

This minimum control requires the development, implementation, and enforcement of a program to address post-construction stormwater runoff controls from both new development and redevelopment sites after development sites disturbing one acre or more, including projects that are less than one acre but are part of a larger common plan for development that disturbs one or more acre. KDHE requires the program to include:

- For permittees which have the authority, ordinances or resolutions to address post-construction runoff from new development and redevelopment projects to the extent allowable under state and local law.
- BMPs to prevent or minimize adverse water quality impacts.
- Strategies which include a combination of structural and/or non-structural BMPs appropriate for the municipality.
- Means to ensure adequate long-term operation and maintenance of BMPs.

Benefit

Conversion of native landscape to developed landscape increases both the volume of stormwater runoff and pollutant loads in stormwater. The consequences can include erosion, flooding, and pollution, impacting both downstream property owners and public infrastructure. Stormwater controls included in development sites can help reduce impacts and costs to both private property owners and the public.

BMPs, Goals, and Staff

Post-Construction Stormwater Management in New Development and Redevelopment				
BMP	BMP Description	Measurable Goal	Lead Staff	Schedule
5.1 Enforce Post Construction Runoff Control Regulations	Review all SWQMP's to determine compliance with regulations	Number of SWQMP's reviewed	Urban Services Division, PWKS	Permit years 1,2,3,4,5
	Hold pre-construction meetings to clarify post-construction BMPs for site.	Number of Pre-construction meetings held	Urban Services Division, PWKS	Permit years 1,2,3,4,5
	Issue Post Construction BMP permits after development has reached 90% completion and tributary area to BMP has been permanently stabilized	Number of Permits issued	Urban Services Division, PWKS	Permit years 1,2,3,4,5

SECTION THREE

Six Minimum Control Measures

Post-Construction Stormwater Management in New Development and Redevelopment				
BMP	BMP Description	Measurable Goal	Lead Staff	Schedule
	Require "as-builts" or design certification from engineer at conclusion of a project to ensure that the BMP has been built as designed.	As-builts and/or design certifications received and documented	Urban Services Division, PWKS	Permit years 1,2,3,4,5
	Require owner/operator to provide documentation detailing inspection dates and maintenance performed one year after construction, and every three years thereafter.	Inspection forms received and documented	Urban Services Division, PWKS	Permit years 1,2,3,4,5
	If owners/operators fail to inspect and/or perform necessary maintenance take actions that allow the county to abate problem	Number and summary of enforcement measures taken	Urban Services Division, PWKS	Permit years 1,2,3,4,5
5.2 Tracking System	Maintain a GIS tracking system with BMP location and owner contact information	Database updated as needed	Urban Services Division, PWKS	When needed
5.7 Develop an educational program for staff, developers and plan designers.**	Provide training to contractors and staff.	Number of people trained	Urban Services Division, PWKS	As opportunities arise
5.8 Annual Program Review	Assess Stormwater Management Program and revise as needed	Annual Report and revised Stormwater Management Plan completed (if necessary) completed and submitted to KDHE	Urban Services Division, PWKS	Permit years 1,2,3,4,5
** BMP is voluntary and will be accomplished as funding and opportunities allow.				

Program Assessment

The overall success of the Post-Construction Stormwater Management Program will be measured through the successful implementation and enforcement of the Post Construction Stormwater Quality Treatment Regulations for Unincorporated Area of Johnson County, KS; Res. 069-08, adopted in 2008. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. Success will also be measured by the following:

- Number of plans reviewed
- Ordinances updated and procedures enacted

3.6 CONTROL MEASURE 6 - POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Description

This minimum control measure requires the development and implementation of an operation and maintenance and training program to reduce and prevent stormwater pollution from public facility operations such as park and open space maintenance, fleet and building maintenance, new construction and land disturbance, and stormwater system maintenance.

Benefit

Leading by example on public facilities and projects provides an opportunity to demonstrate and teach proper techniques to other landowners, and it is available on a routine and ongoing basis.

BMPs, Goals, and Staff

Pollution Prevention/Good Housekeeping for Municipal Operations				
BMP	BMP Description	Measurable Goal	Lead Staff	Schedule
6.1 Reduce pollutant runoff from municipal operations.	Periodically audit County-owned facility(s) and/or County operations that may potentially impact surface water through the MS4.	Facility Name/Operation Date of last audit	Urban Services Division, PWKS	Permit years 1,2,3,4,5
	Develop SWPPP(s) for facility(s) and/or operation(s).	SWPPP(s) completed and on file	Urban Services Division, PWKS	Permit years 1,2,3,4,5
6.2 Conduct staff training.	Provide training to educate staff on identifying and minimizing stormwater pollution from daily operations.	Number of people trained	Urban Services Division, PWKS	Permit years 1,2,3,4,5
6.3 Annual Program Review	Assess Stormwater Management Program and revise as required	Annual Report and revised Stormwater Management Plan completed (if necessary) completed and submitted to KDHE (if required)	Urban Services Division, PWKS	Permit years 1,2,3,4,5

Program Assessment

The overall success of the Pollution Prevention/Good Housekeeping Program will be measured through the successful implementation of facility SWPPPs, employee training and facility inspections conducted as part of the program. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. In addition, success will also be measured by:

- The number of inspections conducted
- The number of problems discovered and resolved
- Training classes conducted

SECTION FOUR

Total Maximum Daily Load (TMDL) Regulated Pollutants

TMDL Pollutants

TMDL regulated pollutants and impaired streams identified in the city's 2014 permit are listed below:

Impaired Stream	TMDL Regulated Pollutant		
	Bacteria	Nutrients	Sediment
Camp Creek	x	x	x
Kill Creek	x	x	x
Big Bull Creek		x	
Little Bull Creek		x	
Coffee Creek	x	x	x
Wolf Creek	x	x	x

Best Management Practices (BMPs)

All six of the minimum control measures are designed to reduce pollutants in stormwater runoff. Those BMPs especially targeting bacteria, nutrients, and sediment, the most common TMDL pollutants in urbanized Johnson County, include the following:

Bacteria

- Public Education and Outreach: The Pet Waste Pickup Campaign, supported through funding of the Mid-America Regional Council (MARC) Water Quality Education Committee, directly addresses this pollutant
- Illicit Discharge Detection and Elimination Program
- Post-Construction Runoff Controls requiring the implementation of post-construction BMPs

Nutrients

- Public Education and Outreach: Programs conducted by Johnson County Stormwater Management Program on behalf of the cities include the Water Quality Education Grant Program; Homeowner BMP Cost Share Program; K-State Extension Water Quality Partnership
- Post-Construction Runoff Controls requiring the implementation of post-construction BMPs

Sediment

- Erosion & Sediment Control at Construction Sites: Permitting and inspection program
- Post-Construction Runoff Controls requiring the implementation of post-construction BMPs

Pollutant Reduction Goals

Success in achieving reductions in bacteria, nutrients, and sediment will be assessed by directly monitoring in-stream concentrations and evaluating pollutant concentration trends across the permit period. The monitoring program is being conducted by the Johnson County Stormwater Management Program on behalf of the cities in the county.

Mapping

A map of the permit area is included as Attachment 1. The permitted area for unincorporated Johnson County is indicated by all areas shaded grey on the attached map.

An in-stream monitoring program targeting impaired streams and TMDL pollutants throughout Johnson County is being undertaken by the Johnson County Stormwater Management Program in conjunction with the USGS Cooperative Water Program. This program is being conducted on behalf of the cities in the county. Annual results of the monitoring program will be provided to the cities as well as the KDHE.

The monitoring program will include:

1. A network of 25 sites where discrete samples will be collected with passive samplers. Sample locations are located where streams generally enter and leave jurisdictional boundaries in impaired watersheds.
2. Targeted analytes include nutrients, suspended sediment, and *Escherichia coli* bacteria.
3. Four samples will be collected at each site annually (environmental conditions permitting, with a minimum of two samples collected in calendar year 2014).
4. Samples will be collected from storm events of at least 0.5 inches in 24-hours and samples will be collected during the rising limb of the storm events.
5. USGS is also including additional sampling techniques and added parameters at selected locations to help assess the effectiveness of the overall monitoring program.
6. Data will be compiled and reviewed on a routine basis and an annual summary of results provided.

A map of TMDL monitoring locations is included as Attachment 1. In addition to showing the unincorporated area of the county, this map also shows monitoring locations for TMDL monitoring for all responsible municipalities in the County. The TMDL monitoring locations specific to the permit issued to the unincorporated area of Johnson County are Kill Creek at 95th St., Camp Creek at 95th St., Coffee Creek at Lackman Rd, Coffee Creek at Pflumm Rd, Wolf Creek at Pflumm Rd., Big Bull Creek at 191st St., Big Bull Creek at I-35, and Little Bull Creek at 215th St..

Permit Compliance Schedule

Part IV of the 2014 permit includes the following compliance schedule requirements:

- **Year 2014:** Complete inventory and maps of outfalls, streams, and lakes in targeted areas; drainage basins for structural and non-structural BMPs; Select and initiate or continue effective plans for source control programs targeted to TMDL pollutants.
- **July 1, 2014:** Implement new source control programs and the initial stormwater monitoring program. (The plan for the monitoring program was developed prior to July 1, 2014. With concurrence of KDHE, sampling was to begin in Fall 2014, however, the 25-site sampling network for all TMDL responsible municipalities in the County was not fully installed and tested by the U.S. Geological Survey until Dec. 2014, resulting in no sample collection in 2014. Sample collection will begin in Spring 2015).
- **February 28, 2015:** Submit a copy of this updated SMP to KDHE.
- **Year 2015:** Continue source control programs and monitoring program.
- **Year 2016:** Continue source control programs and monitoring programs.
- **July 1, 2016:** Select, design, and initiate installation of appropriate structural BMPs.
- **Year 2017:** Continue source control programs and monitoring program.
- **Year 2018:** Continue source control programs and monitoring program.
- **February 28, 2019:** Provide a final report on the effectiveness of source controls and structural BMPs to achieve the measurable goals and summarize water quality data from selected sites.

Annual Reporting

A calendar year annual report will be submitted to KDHE by February 28 of each year. The report will cover activities conducted during the prior calendar year and will include the following:

- Summary of compliance activities associated with the permit
- A review of the appropriateness of BMPs and progress towards achieving water quality goals
- Results of information collected and analyzed, if any, including monitoring data
- Summary and status of stormwater activities conducted during the previous year
- Summary of stormwater activities scheduled to take place during next reporting cycle (including schedule)
- Map showing changes in jurisdictional permit area, if appropriate
- Description of significant changes in any BMPs, including the six minimum control measures
- Copies of updated ordinances or resolutions associated with this SMP or the six minimum control measures

SECTION SIX

Permit Compliance Schedule and Annual Reporting

- Updated list of other parties which will be responsible for implementing program areas of this SMP, as required

This SMP will be evaluated annually and modifications to the Plan, if any, will be submitted with the annual report.

Minor modifications to BMPs listed in this plan, if needed to meet program objectives, will be made within 60 days determination by the permittee or written notification from KDHE.

Major modifications to BMPs listed in this plan, if needed to meet program objectives, will be proposed in a written plan to KDHE, within 60 days determination by the permittee or written notification from KDHE.

