

## BACKGROUND

Urban and suburban stormwater runoff carries with it a wide variety of pollutants to local streams. Much of this runoff finds its way to our streams through storm sewer systems. The United States Environmental Protection Agency (EPA) attempts to address this issue through a program called the National Pollutant Discharge Elimination System, or NPDES. NPDES addresses many sources of pollution. One of the ways NPDES addresses pollution through the Municipal Separate Storm Sewer Systems, or MS4, program. A separate storm sewer system is a storm sewer system that carries only stormwater runoff (Sanitary sewer systems carry sewage and combined systems carry both sewage and stormwater).

These regulations apply to MS4s located in urbanized areas based on the 2000 census. An MS4 need not be a system owned or operated by a municipality. Other entities, such as counties, universities or hospitals, which own or operate a separate storm sewer system, may also be regulated. Dauphin County has been designated as an entity that must comply with National Pollutant Discharge Elimination System (NPDES) Phase II requirements for small Municipal Separate Storm Sewer Systems (MS4s). The regulations are implemented in Pennsylvania through the Department of Environmental Protection (DEP).

Dauphin County has several facilities which have separate storm sewer systems within the urbanized areas. These are listed below with the watershed to which they discharge shown in parentheses:

1. Dauphin County Prison (Spring Creek)
2. Schaffner Center (Spring Creek)
3. Adult Probation and Work Release Complex (Spring Creek)
4. Women's Work Release Center (Spring Creek)
5. Wildwood Lake Nature Center (Paxton Creek)
6. Fort Hunter Park (Susquehanna River)
7. Transportation Building (Spring Creek via Swatara Township Storm Sewer)

Entities required to comply with the regulations must develop a plan which addresses six Minimum Control Measures (MCMs). These MCMs are:

1. Public Education
2. Public Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Stormwater Management
5. Post Construction Stormwater Management
6. Good Housekeeping at Municipal Facilities

There are two options available for the implementation plan. The entity may develop its own plan or may commit to utilizing the protocol developed by DEP for implementing the six MCMs. Dauphin County uses the DEP protocol. Utilizing the protocol has two advantages. First, it already exists, thereby eliminating the need to expend county resources on developing a plan. Second, the protocol is pre-approved by DEP as being in compliance with the regulations. This eliminates a required DEP review of the plan and possible rejection of the plan.

## DEP PROTOCOL

The protocol outlines a schedule for each MCM and details activities necessary each year to implement the MCM. While this "cook book" approach serves well as a general guideline and schedule of activities for the regulated entity, the county will need to develop the specific details for their plan. These specific details for Dauphin County are discussed later.

The protocol was developed primarily for use by municipal governments. Given the nature of the county facilities and the regulatory authority of county government, Dauphin County uses the protocol for the six MCMs to the extent that they are applicable and supplements the requirements with applicable efforts and activities.

## INTERMUNICIPAL COOPERATION

Working relationships were formed with other municipalities in Dauphin County subject to MS4 regulations. These relationships are associated with MCM 1, Public Education. Specifically, the publication of an educational newspaper ad and distribution of posters have been done cooperatively. Additionally, the Dauphin County Conservation District conducts county wide educational efforts such as workshops

## PUBLIC COMMENT

This plan is posted on the Conservation District website to provide the public with an opportunity to review county compliance activities and to offer comments. Comments on this plan, or any other stormwater management activities that the Conservation District may be involved in should be forwarded to:

Dauphin County Conservation District  
1451 Peters Mountain Road  
Dauphin PA 17018  
Fax 717-921-8276

Please feel free to offer any input you may have!

## MCM 1 - PUBLIC EDUCATION

YEAR 1 - MARCH 10, 2003 THROUGH MARCH 9, 2004

**1. DETERMINE TARGET AUDIENCE** - The DEP protocol lists three required target audiences; home owners, business owners and developers. The homeowner and business owner target audiences will be served by the municipal effort in the Paxton and Spring Creek watersheds. Dauphin County will conduct educational efforts for the developer target audience on behalf of all regulated municipalities within the county. Further, because county facilities, with the exception of Fort Hunter and Wildwood Lake, are not used by the public at large, and none of the facilities are developable, a different approach will be required to educate the facility users. An additional target audience for county facilities will be:

- Park visitors at Fort Hunter and Wildwood Lake
- Friends of Fort Hunter and Wildwood Lake
- Staff at all facilities
- Visitors at all facilities
- Residents of appropriate facilities

**2. DEVELOP PUBLIC EDUCATION PLAN** - The following outlines the plan to reach the target audience and includes the channels and materials to be employed.

- Utilize materials provided by DEP and developed by the Conservation District designed to educate the public on stormwater related issues.
- Develop a list of publications (i.e., municipal, agency or organization newsletters) for dissemination of stormwater educational materials to the target audience. The initial list of information channels includes:
  - Friends of Wildwood Lake and Friends of Fort Hunter mailings
  - Parks and Recreation Department newsletter
  - Dauphin County newsletter
  - Dauphin County Community e-letter
  - Paxton Creek Watershed and Education Association newsletter
  - Swatara Creek Watershed Association newsletter
  - Press releases through County
  - Municipal Newsletters
  - Newspapers (Harrisburg Evening News, Middletown Press and Journal, Hummelstown Sun, The Guide)
  - Home Builders Association of Metropolitan Harrisburg Magazine
  - County Payroll
  - Conservation District website
- Publish at least one stormwater related article annually in one or more applicable publications.
- Supply Parks and Recreation Department with information to be included in mailings.
- Place pamphlets, posters, displays or other educational materials, as appropriate, at county facilities.
- Attach an educational information sheet to paychecks of all county employees.
- Develop public presentations, aimed at various target audience, regarding stormwater runoff issues
- Conduct one presentation, open to members of the target audience segment from all three watersheds in which county facilities are located, in year one. Coordinate with other municipalities, agencies or organizations and advertise the presentation in appropriate publications.
- Provide a link from the Dauphin County website to the Conservation District website. Maintain a section of the website as a stormwater information page. Provide a link from the Conservation District website to the

DEP stormwater management website. As the Dauphin County website is being utilized, the links will be provided on behalf of all municipalities in Dauphin County subject to MS4 regulations.

- Coordinate activities with municipalities, other organizations and agencies to avoid duplication of effort, to maximize efficiency and to document educational efforts for inclusion in annual compliance report.
- Develop a stormwater runoff table top display for use at public events. The display may be made available to municipalities or other agencies subject to Conservation District policy.

**3. DISSEMINATE EDUCATIONAL MATERIALS** - This task entails the dissemination of the educational materials through the channels discussed above. Specific items to be accomplished in year one are:

- Distribute "When it Rains, it Drains" pamphlet and program sheet to all county employees through payroll.
- Distribute "When it Rains, it Drains" pamphlet and developer fact sheet to developers, designers and contractors in Dauphin County. This is done on behalf of all regulated municipalities and Dauphin County.
- Place District stormwater runoff display at at least one public event.
- Conduct workshop for developers, designers and contractors in conjunction with annual E and S workshop. This is done on behalf of all MS4 regulated county municipalities and Dauphin County.
- Participate in annual Parks and Recreation Department lecture series at wildwood lake center.
- Post stormwater materials on District website. Provide link from County website to District website and from District website to DEP stormwater website. This is done on behalf of all MS4 regulated county municipalities and Dauphin County.
- Post this plan on District website for review and comment.

#### **4. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**YEARS 2 THROUGH 5 - MARCH 10, 2004 THROUGH MARCH 9, 2008**

##### **1. IMPLEMENT THE PLAN AND REVISE AS NEEDED.**

- Review and update lists of publication.
- Review other aspects of plan for effectiveness and for new opportunities and revise plan as needed.
- Review and update educational materials and develop new materials as needed.
- Publish at least one article annually in appropriate publications.
- Conduct at least one public presentation on stormwater related issues. Ideally, presentations subsequent to the year one will focus on different target audience segments and present new and appropriate information.
- Coordinate developer education workshop with annual E and S workshop. Distribute additional educational materials through direct mailing to developers.
- Supply Parks and Recreation Department with information to be included in mailings
- Place pamphlets, posters, displays or other educational materials, as appropriate, at county facilities.
- Attach an educational information sheet to paychecks of all county employees.
- Ensure that links to DEP stormwater websites are current.
- Continue to coordinate activities with municipalities and other organizations.
- Post this plan and any revisions on County website for review and comment.

**YEAR 6 THROUGH 8 - MARCH 10, 2008 THROUGH MARCH 9, 2011**

##### **1. IMPLEMENT THE PLAN AND REVISE AS NEEDED.**

##### **2. DOCUMENT ACTIVITIES FOR INCLUSION IN THE ANNUAL REPORT.**

## MCM 2 - PUBLIC PARTICIPATION

### **YEAR 1 - MARCH 10, 2003 THROUGH MARCH 9, 2004**

**1. DEVELOP A PUBLIC PARTICIPATION PROGRAM** - DEP has determined that the public participation element of Act 167 planning satisfies this MCM Paxton and Spring Creek watersheds. As Fort Hunter Park is not in a watershed for which an Act 167 plan is being prepared, a separate effort must be put forth for this facility. Additionally, opportunities for public involvement in all areas will be evaluated and pursued where practical. The public participation plan is as follows:

- Continue coordinating of Act 167 planning in Paxton and Spring Creek watersheds. Incorporate Public Participation element, as determined by the Watershed Plan Advisory Committees (WPACs).
- Solicit public input on this plan. Post plan on the District website for public review and comment.
- Coordinate relevant activities with municipalities and other organizations where possible and practical.

### **2. DOCUMENT ACTIVITIES FOR INCLUSION IN THE ANNUAL REPORT.**

### **YEAR 2 - MARCH 10, 2004 THROUGH MARCH 9, 2005**

#### **1. NOTIFY AND SOLICIT PUBLIC INPUT/INVOLVEMENT ON PLAN.**

- Continue public participation through Act 167 planning in Paxton and Spring Creek watersheds.
- Using appropriate channels the public will be informed of this plan and comments on the plan will be solicited.
- Post this plan on Conservation District website for public review and comment.
- Continue to coordinate any relevant activities with municipalities or other agencies and organizations.

#### **2. DOCUMENT ACTIVITIES FOR INCLUSION IN THE ANNUAL REPORT.**

### **YEARS 3 THROUGH 5 - MARCH 10, 2005 THROUGH MARCH 9, 2008**

#### **1. NOTIFY THE PUBLIC.**

- Provide opportunity for public comment on any significant revisions to this plan via District website.
- Continue to coordinate activities with municipalities, other agencies and organizations.

#### **2. DOCUMENT ACTIVITIES FOR INCLUSION IN THE ANNUAL REPORT.**

### **YEAR 6 THROUGH 8 - MARCH 10, 2008 THROUGH MARCH 9, 2011**

#### **1. NOTIFY THE PUBLIC.**

- Provide opportunity for public comment on any significant revisions to this plan via District website.
- Continue to coordinate activities with municipalities, other agencies and organizations.

#### **2. DOCUMENT ACTIVITIES FOR INCLUSION IN THE ANNUAL REPORT.**

## MCM 3 - ILLICIT DISCHARGE DETECTION AND ELIMINATION

### **YEAR 1 - MARCH 10, 2003 THROUGH MARCH 9, 2004**

**1. MAP STORM SEWER SYSTEM OUTFALLS AT REGULATED FACILITIES** - For all regulated county facilities, all storm sewer system outfalls will be mapped as follows:

- Mapping will be done by Conservation District staff.
- Outfalls will be located in field using a GPS device and mapped using USGS 7.5 minute quads as a base map.

**2. ADOPT ORDINANCES PROHIBITING ILLICIT DISCHARGES** - This item is not applicable because the county has no authority to enact and enforce such ordinances. It should be noted that these ordinances will be enacted by all municipalities where county facilities are located. Because these municipalities are participating in Act 167 planning, this item may be delayed for one year.

**3. PRESENTATION AND DISTRIBUTION OF EDUCATIONAL MATERIALS** - This educational effort is aimed specifically at illicit discharges. This item may be delayed for one year in the Paxton and Spring Creek watersheds.

- This will be coupled with the public education effort required by MCM 1, using the same distribution channels.
- Conservation District will coordinate efforts with Municipalities in the Paxton and Spring Creek watersheds.

**4. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**YEARS 2 THROUGH 5 - MARCH 10, 2004 THROUGH MARCH 9, 2008**

**1. PRIORITIZE OUTFALLS AND CONDUCT FIELD SCREENING FOR 25% OF THE SYSTEMS OUTFALLS EACH YEAR.**

- District staff will field screen outfalls in annual priority area twice per year during dry weather conditions.
- If dry weather flows observed, samples will be analyzed in field for required parameters by District Staff using field methods. The exception to this is the bacteria analysis which must be done by a certified lab.
- The annual priority areas are as follows:

Year 1- Fort Hunter Park, Wildwood Lake Center (3 outfalls)

Year 2- Adult Probation and Work Release and Schaffner Juvenile Center (4 outfalls)

Year 3- Spring Creek Rehabilitation and Health Care Center and Women's Work Release (3 outfalls)

Year 4- Dauphin County Prison (4 outfalls)

**2. REMEDIATE ILLICIT DISCHARGES, IF DISCOVERED** - If the field screening indicates that an illicit discharge is occurring, steps to correct the situation are needed. The steps to be followed if this situation occurs are as follows:

- Based on the sampling, existing facilities and land use, attempt to determine the source of the discharge.
- If the source cannot be determined using the available information, tracing the source up-system will be required. All systems at regulated facilities have been mapped.
- Once the source of the discharge is located, develop a plan to eliminate the discharge. Illicit discharges may take several forms including illegal dumping and illegal connections. As these storm sewer systems are all county owned facilities, the County Commissioners will be apprised of any detected illicit discharges.

**3. CONTINUE EDUCATIONAL EFFORT FOR ILLICIT DISCHARGES** - Same as shown above for year one.

**4. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**YEAR 6 - MARCH 10, 2008 THROUGH MARCH 9, 2009**

**1. PRIORITIZE OUTFALLS - CONDUCT FIELD SCREENING FOR 25% OF OUTFALLS EACH YEAR.**

- District staff will field screen outfalls in priority area twice per year during dry weather conditions.
- If dry weather flows observed, samples will be analyzed in field for required parameters by District staff using field methods. The exception is the bacteria analysis which must be done by a certified lab.
- The annual priority areas are as follows:

- Year 1- Fort Hunter Park, Wildwood Lake Center (3 outfalls)
- Year 2- Adult Probation and Work Release and Schaffner Juvenile Center (4 outfalls)
- Year 3- Women's Work Release (1 outfall)
- Year 4- Dauphin County Prison (4 outfalls)

**2. REMEDIATE ILLICIT DISCHARGES, IF DISCOVERED** - If field screening indicates an illicit discharge is occurring, steps to correct the situation are needed. Steps to be followed are as follows:

- Based on the sampling, existing facilities and land use, attempt to determine the source of the discharge.
- If source cannot be determined using available information, tracing the source up-system will be required.
- Once the source of the discharge is located, develop a plan to eliminate the discharge. Illicit discharges may take several forms including illegal dumping and illegal connections. As these storm sewer systems are all county owned facilities, the County Commissioners will be apprised of any detected illicit discharges.

**3. CONTINUE EDUCATIONAL EFFORT FOR ILLICIT DISCHARGES** - Same as shown above for year one.

**4. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

#### **REVISIONS FOR YEAR 6**

1. Incorporate Illicit Discharge information into annual training program
2. Screen highest priority outfalls which are Fort Hunter Park, Wildwood Lake Center (3 outfalls)

**YEAR 7 AND 8 - MARCH 10, 2009 THROUGH MARCH 9, 2011**

**1. CONTINUE TO CONDUCT FIELD SCREENINGS OF OUTFALLS AS PRIORITIZED IN YEAR 6.**

**2. REMEDIATE ILLICIT DISCHARGES, IF DISCOVERED** - If field screening indicates an illicit discharge is occurring, steps to correct the situation are needed. Steps to be followed are as follows:

- Based on the sampling, existing facilities and land use, attempt to determine the source of the discharge.
- If source cannot be determined using available information, tracing the source up-system will be required.
- Once the source of the discharge is located, develop a plan to eliminate the discharge. Illicit discharges may take several forms including illegal dumping and illegal connections. As these storm sewer systems are all county owned facilities, the County Commissioners will be apprised of any detected illicit discharges.

**3. CONTINUE EDUCATIONAL EFFORT FOR ILLICIT DISCHARGES** - Same as shown above for year one.

**4. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

#### **REVISIONS FOR YEAR 8**

1. Consolidate screenings for Prison and Women's Work Release Center

#### **MCM 4 - CONSTRUCTION SITE STORMWATER MANAGEMENT**

**YEAR 1 - MARCH 10, 2003 THROUGH MARCH 9, 2004**

**1. IMPLEMENT ORDINANCE REQUIRING REVIEW AND APPROVAL OF EROSION AND SEDIMENT CONTROL PLANS PRIOR TO APPROVING ANY SUBDIVISION OR LAND DEVELOPMENT PLANS OR ISSUING BUILDING PERMITS** - This does not apply as the county has no authority to implement such ordinances. The municipalities in which county facilities are located must implement the required ordinances.

**2. EDUCATE DEVELOPERS** - The Conservation District will continue existing efforts aimed at educating developers regarding erosion and sediment control. The educational effort for this MCM will be coordinated with the effort required for MCM 1, Public Education. In addition, the Conservation District will coordinate efforts with municipalities.

- Distribute "When it Rains, it Drains" and developer fact sheet from DEP resource CD to developers, designers and contractors. This will be done on behalf of all regulated municipalities in Dauphin County.
- Conduct workshop for developers, designers and contractors in conjunction with annual E and S workshop. This will be done on behalf of all regulated municipalities in Dauphin County.

**3. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**YEARS 2 THROUGH 5 - MARCH 10, 2004 THROUGH MARCH 9, 2008**

**1. CONTINUE THE DEVELOPER EDUCATION EFFORT** - Years 2-5 will duplicate the effort for year 1.

**2. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**YEAR 6 - MARCH 10, 2008 THROUGH MARCH 9, 2009**

**1. CONTINUE THE DEVELOPER EDUCATION EFFORT**

**2. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**REVISIONS FOR YEAR 6 - None**

**YEAR 7 AND 8 - MARCH 10, 2009 THROUGH MARCH 9, 2011**

**1. CONTINUE THE DEVELOPER EDUCATION EFFORT**

**2. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**MCM 5 - POST CONSTRUCTION STORMWATER MANAGEMENT**

**YEAR 1 - MARCH 10, 2003 THROUGH MARCH 9, 2004**

**1. IMPLEMENT ORDINANCES REQUIRING REVIEW AND APPROVAL OF POST CONSTRUCTION STORMWATER MANAGEMENT PLANS PRIOR TO APPROVAL OF SUBDIVISION OR LAND DEVELOPMENT PLANS AND ISSUANCE OF BUILDING PERMITS** - This does not apply as the county has no authority to implement the required ordinance language. The necessary ordinance language will be implemented by the municipalities in which county facilities are located.

**2. ENSURE STORMWATER BMPs ARE BUILT, OPERATED AND MAINTAINED PROPERLY** - See above

**YEARS 2 THROUGH 5 - MARCH 10, 2004 THROUGH MARCH 9, 2008**

**1. IMPLEMENT ORDINANCES** - See above.

**2. ENSURE STORMWATER BMPs ARE BUILT, OPERATED AND MAINTAINED PROPERLY** - See above.

**YEAR 6 - MARCH 10, 2008 THROUGH MARCH 9, 2009**

**1. IMPLEMENT ORDINANCES** - See above.

**2. ENSURE STORMWATER BMPs ARE BUILT, OPERATED AND MAINTAINED PROPERLY** - See above

**YEAR 7 AND 8 - MARCH 10, 2009 THROUGH MARCH 9, 2010**

**1. IMPLEMENT ORDINANCES** - See above.

**2. ENSURE STORMWATER BMPs ARE BUILT, OPERATED AND MAINTAINED PROPERLY** - See above

**MCM 6 - GOOD HOUSEKEEPING AT MUNICIPAL FACILITIES**

**YEAR 1 - MARCH 10, 2003 THROUGH MARCH 9, 2004**

**1. GATHER INFORMATION ON OPERATION, MAINTENANCE AND INSPECTION OF EXISTING STORMWATER FACILITIES** - This task refers to the storm sewer system and related facilities such as detention ponds. During year one, Conservation District staff will:

- Inventory existing storm sewer facilities for regulated county facilities. Inventory will include inlets, detention ponds, outlets and other relevant structures or facilities. A description which includes the information needed to implement this MCM will be developed and keyed to the system map from MCM 3.
- Collect data on existing operation, maintenance and inspection programs at regulated county facilities.
- Collect information on existing pollution prevention and education programs at regulated county facilities.

**2. GATHER INFORMATION ON VEHICLE FUELING, WASHING AND MAINTENANCE FACILITIES** - The DEP protocol for this MCM focuses primarily on vehicle facilities, which are limited in scope at the regulated county facilities. The Conservation District will:

- Review county facilities to determine if there are vehicle facilities other than the car wash bay and fuel pumps at the Spring Creek Rehabilitation Center.
- Review other operations at regulated facilities and determine potential for stormwater contamination. Operations may include landscaping, grounds maintenance, storage, use or disposal of hazardous compounds.

**3. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**YEAR 2 - MARCH 10, 2004 THROUGH MARCH 9, 2005**

**1. DEVELOP OPERATION, MAINTENANCE AND INSPECTION PROGRAM FOR STORMWATER FACILITIES** - Based on the information collected in year one, the Conservation District will:

- Develop a program for the operation, maintenance and inspection of regulated county storm sewer facilities
- Distribute the program to appropriate staff at county facilities.
- Distribute educational materials to staff at county facilities.
- Develop a training program for appropriate staff at county facilities.

**2. DEVELOP A POLLUTION PREVENTION PROGRAM FOR VEHICLE MAINTENANCE, FUELING AND WASHING FACILITIES** - To the extent that these facilities exist, the Conservation District will:

- Develop an education based program to meet the requirements of this component of this MCM.
- Distribute educational materials to facility users using channels established for MCM 1 and placement of signs at the facilities as appropriate.

**3. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**YEAR 3 - MARCH 10, 2005 THROUGH MARCH 9, 2006**

**1. IMPLEMENT THE OPERATIONS, MAINTENANCE AND INSPECTION PROGRAM FOR REGULATED COUNTY STORM SEWER SYSTEMS** - The Conservation District, with assistance from HRG, will:

- Develop a training program for staff at regulated facilities.
- Conduct initial annual training workshop for appropriate staff at regulated county facilities.

**2. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**YEARS 4 THROUGH 5 - MARCH 10, 2006 THROUGH MARCH 9, 2008**

**1. IMPLEMENT THE OPERATIONS, MAINTENANCE AND INSPECTION PROGRAM FOR REGULATED COUNTY STORM SEWER SYSTEMS** - The Conservation District, with assistance from HRG, will:

- Revise training presentation for staff as needed and conduct an annual training workshop

**2. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**REVISIONS FOR YEAR 6 - None**

**YEAR 6 - MARCH 10, 2008 THROUGH MARCH 9, 2009**

**1. IMPLEMENT OPERATIONS, MAINTENANCE AND INSPECTION PROGRAM FOR REGULATED COUNTY STORM SEWER SYSTEMS**

- Revise training presentation for staff as needed and conduct an annual training workshop

**2. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**

**YEAR 7 AND 8 - MARCH 10, 2009 THROUGH MARCH 9, 2010**

**1. IMPLEMENT OPERATIONS, MAINTENANCE AND INSPECTION PROGRAM FOR REGULATED COUNTY STORM SEWER SYSTEMS**

- Revise training presentation for staff as needed and conduct an annual training workshop

**2. DOCUMENT ACTIVITIES FOR INCLUSION IN ANNUAL REPORT.**