

**Rule 13 Permit Evaluation Report
Requirements, Recommendations, Recognitions
327 IAC 15-13**

MS4 Name: TOWN OF CHESTERTON	Date of Evaluation: 07/30/2009
Permit Number: INR040036	Completed By: Reggie Korthals, MPA MS4 Program Coordinator
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MS4 Coordinator or Contact: JENNIFER GADZALA	

Participants:

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**PROGRAM AREA
327 IAC 15-13
MS4 PROGRAM MANAGEMENT**

S	M	U	Y/N	NA/NE	S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable = Not Evaluated Y = Yes N = No	NE
S			Y		1. Did the MS4 submit an initial NOI and SWQMP Part A? Was it complete?	
S			Y		2. Did the MS4 submit a renewal NOI and SWQMP Part A Was the submittal complete?	
S			Y		3. Did the MS4 submit a Part B Baseline Characterization Report? Was the Part B Certification form submitted to IDEM?	
S			Y		4. Did the MS4 develop and implement a Storm Water Quality Management Plan (SWQMP) Part C? Was a certification form submitted to IDEM?	
S			Y		5. Were programmatic indicators identified for each Minimum Control Measure (MCM) in Part C?	
S			Y		6. Is progress regularly measured against the goals stated in the SWQMP?	
S			Y		7. Has the MS4 implemented the BMPs identified in the SWQMP for each MCM?	
S			Y		8. Did the MS4 supply a summary of the current storm water budget, expected or actual funding source, and a projection of the budget for the next permit cycle?	
				NA	9. If Co-permitted, is there an MOU or Inter-local agreement?	

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			NA	10..	If Co-Permitted, does each party have a copy of the signed agreement?
			NA	11.	If Co-permitted, has the agreement been reviewed and or updated for the second five year permit term?
S		Y		12.	If a TMDL is approved for any water body into which an MS4 conveyance discharges, has the MS4 reviewed and appropriately modified Parts B and C of their SWQMP?
S		Y		13.	Does the MS4 document all activities and maintain appropriate records?
S		Y		14.	Does the MS4 submit required annual reports to IDEM?
S		Y		15.	Was the MS4 prepared for the permit evaluation and inspection and did they provide materials requested by IDEM? TOWN MANAGER, STORM WATER BOARD MEMEBERS, AND TOWN COUNCIL MEMBERS ATTENDED

Observations:

- The Town of Chesterton MS4 has worked cooperatively with IDEM and partners throughout the first permit cycle.
- The MS4 conducted an extensive self evaluation prior to the permit audit that helped prepare them for the evaluation and inspection.
- The MS4 has developed an organizational chart that describes the roles and responsibilities for each staff member.
- The MS4 was well prepared for the permit evaluation and provide copies of all required documents.
- The Town of Chesterton has utilized a number outside groups for program implementation: Indiana DNR, Coffee Creek Conservancy District, Save The Dunes Council
- The Town of Chesterton has completed a review of their SWQMP Part B Characterization Plan.
- The MS4 has a program in place to successfully complete program management of the permit.

Recommendations:

- The MS4 has demonstrated a commitment to implementing the SWQMP at the highest level.
- The permittee should maintain that effort at or above current funding and staffing levels.

Requirements:

- The Town of Chesterton shall review and up-date their SWQMP Part C and submit the updates as an attachment to the annual report due to IDEM on October 1, 2010.
- There are no additional **program management** requirements at this time.

Recognitions:

- IDEM recognizes the Town of Chesterton for its continued and increased efforts to implement their Rule 13 storm water general permit that includes the SWQMP.
- IDEM recognizes the Town of Chesterton for its internal organization addressing program management and the inclusion and commitment of key elected officials and departments such as street department, park department, and engineering.
- IDEM also recognizes the work that the MS4 does in program management that is above and beyond what is identified in their SWQMP.

Further Action:

- IDEM will continue to monitor program management by the MS4 through assessment of the SWQMP activities and periodic inspections.

PROGRAM AREA 327 IAC 15-13-12 SWQMP PUBLIC EDUCATION AND OUTREACH						
S	M	U	Y/N	NA/NE		S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable NE = Not Evaluated Y = Yes N = No
S			Y		1.	Was reasonable documentation provided to show that an attempt was made to reach all constituents within the MS4 area?
S			Y		2.	Did the MS4 submit to IDEM a certification form once the program was developed and implemented?
S			Y		3.	Did the MS4 implement an informational program with educational materials for identified constituents? ABOVE AND BEYOND THE REGIONAL PROGRAM
S			Y		4.	Did the MS4 utilize existing programs and outreach materials? STRONGLY SUPPORTED THE REGIONAL EFFORTS
S			Y		5.	Did the MS4 partnered and/or coordinated with other MS4s in the area or other organizations with in the MS4 area to implement an informational program?
S			Y		6.	Is the education program reviewed for adequacy and accuracy and is it updated as necessary?
S			Y		7..	Did the MS4 develop measurable goals for this MCM?
S			Y		8.	Did the MS4 do an initial storm water quality assessment of constituent knowledge in the MS4 area? SURVEY
S			Y		9.	Did the MS4 do a follow-up assessment of constituent knowledge and participation in the MS4 area? SEE OBSERVATIONS
S			Y		10.	Were specific target outreach or goal percentages and timetables identified?
S			Y		11.	Did the MS4 target improvement in disposal practices (Recycling)?
S			Y		12.	Did the MS4 target schools and school curriculum for storm water education?
S			Y		13.	Did the MS4 develop materials in a second language?
S			Y		14.	Has the MS4 implemented the BMPs identified in their SWQMP?
S			Y		15.	Has the MS4 kept documentation of all activities conducted under this MCM?
S			Y		16.	Did the MS4 provide copies of all materials produced and used in educational program for the permit evaluation?
S			Y		17..	Is the MS4 a CSO entity? If so, has LTCP been reviewed and changes made?

<p>Observations:</p> <ul style="list-style-type: none"> • Additional observations and comments on the regional public education program are include in the regional program review report • The individual efforts of the Town of Chesterton and the cooperative efforts of the NWI Partnership for Water Quality have put the storm water pollution prevention efforts in the public eye. • The educational program has been assessed on a regular basis and adjustments made. • The Town of Chesterton utilizes the materials developed for the regional partnership in a successful manner in their community • The initial constituent assessment was done in 2005 and statistically relevant survey was completed by the partnership in 2008 and a follow-up to that survey is planned for 2011 or 2012. • The MS4 engages the public and provides numerous educational opportunities: library materials, school programs, Boy Scout Troop, Student Field Days, and published articles in the newspapers. • The MS4 identified plans to target residential stakeholders in the current permit term.
<p>Recommendations:</p> <ul style="list-style-type: none"> • The MS4s should continue to implement the storm water public education program at or above the current level. • The MS4 should continue to engage students in program implementation • The MS4 should develop a plan to identify specific stakeholders for educational opportunities
<p>Requirements:</p> <ul style="list-style-type: none"> • The Town of Chesterton shall continue to review and update their public education program and include those updates with their SWQMP Part C revisions due to IDEM on October 1, 2010. • No other permit requirements are required at this time.
<p>Recognitions:</p> <ul style="list-style-type: none"> • IDEM recognizes the Town of Chesterton for a public education program that goes beyond the regional efforts and focuses on the particular needs of their community. • IDEM recognizes the Town of Chesterton for its efforts to introduce storm water education into the schools
<p>Further Action:</p> <ul style="list-style-type: none"> • IDEM will continue to monitor the public education program by the MS4 through regular assessment of the SWQMP, review of annual reports, MS4 activities and periodic inspections.

PROGRAM AREA 327 IAC 15-13-13 SWQMP PUBLIC PARTICIPATION AND INVOLVEMENT						
S	M	U	Y/N	NA/NE	S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable = Not Evaluated Y = Yes N = No	NE
S			Y		1.	Did the MS4 develop a SWQMP that includes provisions to allow opportunities for constituents to participate in the storm water management program development, implementation, and review?
S			Y		2.	Did the MS4 provide documentation that demonstrates sufficient opportunities were allotted to involve constituents?
S			Y		3.	Does the MS4 have a plan to provide for participation during the second permit period?

S			Y		4.	Did the MS4 submit to IDEM a certification form once the program was developed and implemented?
S			Y		5.	Does the MS4 comply with applicable public notice requirements?
S			Y		6.	Did the MS4 supply documentation of public notices and event documentation?
S			Y		7.	Does the MS4 provide regular program updates and storm water information to elected officials?
S			Y		7.	Did the MS4 develop measurable goals for this MCM?
			N		8.	Did the initial assessment of the MS4 area identify constituents interested in participation in the storm water program? SEE OBSERVATIONS
S			Y		9.	Did the MS4 identify specific outreach and reduction goal percentages and identify a timetable and was the timetable met?
S			Y		10.	Did the SWQMP goals for this MCM address participation in citizen panels, community clean-ups, citizen watch groups, drain marking projects and public meeting notification?
S			Y		11.	Did the MS4 keep adequate documentation of activities and events?
S			Y		12.	Does the MS4 have plans to up-date the program?
Observations:						
<ul style="list-style-type: none"> The MS4 has also focused on education of contractors, developers, and engineers along with workshops for government officials and residents. Employee training has been included in program implementation Review of the Website made it difficult to find permit information and the winners of the design a watershed sign, plus are there any Storm Water Heroes? 						
Recommendations:						
<ul style="list-style-type: none"> The MS4s should continue to implement the public involvement program at or above the current level. The MS4s should continue to work with the regional partnership. The MS4 should work to ensure that the website is current. 						
Requirements:						
<ul style="list-style-type: none"> The MS4 shall continue to review and update their public participation efforts and include those updates with their SWQMP Part C revisions due to IDEM on October 1, 2010. 						
Recognitions						
<ul style="list-style-type: none"> IDEM recognizes the MS4's effort to involve the public, educate elected officials and engage students The Town of Chesterton's "Become a Storm Water Hero" program and the watershed design a sign contest were excellent opportunities for public participation 						
Further Action:						
<ul style="list-style-type: none"> IDEM will continue to monitor the public involvement program by the MS4 through regular assessment of the SWQMP, review of annual reports, MS4 activities and periodic inspections. 						

PROGRAM AREA 327 IAC 15-13-14 SWQMP ILLICIT DISCHARGE DETECTION AND ELIMINATION					
S	M	U	Y/N	NE	S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable Not Evaluated Y = Yes N = No
S			Y		1. Is there an ordinance or other regulatory mechanism in place that prohibits illicit discharges into MS4 conveyances and establishes appropriate enforcement procedures and actions? 327 IAC 15-13-14(c)
S			Y		2. Did the MS4 submit to IDEM a certification form once the regulatory mechanism was in place?
S			Y		3. Has the MS4 completed a storm sewer system map showing the location of all outfalls and MS4 conveyances in the MS4 area under the MS4s control?
S			Y		4. Has the MS4 provided the names and locations of all waters that receive discharges from those outfalls?
The complete audit of MCM # 3 for Illicit Discharge Detection and Elimination will be conducted at another time.					
Observations:					
<ul style="list-style-type: none"> The Town of Chesterton has completed all permit requirements for the illicit discharge detection and elimination minimum control measure require during the first permit term. All required documentation was provided at the time of the audit. 					
Requirements:					
<ul style="list-style-type: none"> The MS4s shall continue to implement the permit and prepare for the audit of the screening process in 2011 					

PROGRAM AREA 327 IAC 15-13-15 SWQMP CONSTRUCTION SITE STORM WATER RUN-OFF CONTROL					
S	M	U	Y/N	NE	S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable Not Evaluated Y = Yes N = No
S			Y		1. Has a signed certification form been submitted to IDEM indicating that an ordinance or other regulatory mechanism is in place?
S			Y		2. Does the MS4 submit to IDEM the required monthly construction reports?
The audits of the MCM construction site plan reviews and site inspections were completed by the Storm Water Specialists and reports provided to the MS4					

PROGRAM AREA 327 IAC 15-13-16 SWQMP POST CONSTRUCTION STORM WATER RUN-OFF CONTROL					
S	M	U	Y/N	NE	S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable Not Evaluated Y = Yes N = No
S			Y		1. Has a signed certification form been submitted to IDEM indicating that an ordinance or other regulatory mechanism is in place and a program has been implanted to control post construction storm water run-off?
The complete audit of MCM #5 for Post Construction Storm Water Run-off Control will be conducted at another time.					

PROGRAM AREA 327 IAC 15-13-17 SWQMP MUNICIPAL OPERATIONS POLLUTION PREVENTION AND GOOD HOUSEKEEPING					
S	M	U	Y/N	NE	S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable Not Evaluated Y = Yes N = No
			Y		1. Did the MS4 develop and implement a program to prevent or reduce pollutant run-off from municipal operations and is the plan included in their SWQMP (Facility SWPPP)
			Y		2. Did the MS4 submit to IDEM a certification form once the program was developed and implemented?
			Y		3. Does the MS4 keep written documentation of maintenance activities, maintenance schedules, and long term inspection procedures for BMPs?
			Y		4. Did the MS4 develop controls for reducing or eliminating the discharge of pollutants from operational areas, fueling areas, roads, parking lots, maintenance and storage yards, and waste transfer stations?
			Y		5. Did the MS4 develop written procedures for the proper disposal of waste or materials removed from separate storm sewer systems and operational areas?
				NA	6. Did the MS4 provided written documentation that new flood management projects are assessed for their impacts on water quality and existing flood management projects are examined for incorporation of additional water quality protection devices and practices?

			Y		7.	Did the MS4 provide written documentation that appropriate MS4 entity employees were properly trained, with periodic refresher sessions?
			Y		8.	Did the MS4 develop measurable goals for this MCM? Were specific reduction percentages and timetables identified?
Observations:						
<ul style="list-style-type: none"> The MS4 developed a comprehensive Storm Water Pollution Prevention Plan that includes a spill response form, facility inspection form, employee training records form, and an annual site compliance evaluation. All facilities have a copy of the plan. The MS4 has provided training for all non-office employees. Informational posters will be hung at all facilities when posters become available. The cooperation by department/facility superintendents helps with implementation success 						
Recommendations:						
<ul style="list-style-type: none"> Recommendations for each facility are included on the facility inspection report 						
Requirements:						
<ul style="list-style-type: none"> The MS4 shall continue to demonstrate a commitment to implement their SWPPP to prevent or reduce pollution run-off from municipal operations. The MS4 shall continue to document all maintenance activities, maintenance schedules and long term inspection procedures for BMPs 						
Recognitions:						
<ul style="list-style-type: none"> IDEM recognized the Town of Chesterton for its comprehensive Storm Water Pollution Prevention Plan for municipal operations 						
Further Actions:						
<ul style="list-style-type: none"> IDEM will continue to monitor good housekeeping practices at municipally owned facilities through assessment of the SWQMP, review of annual reports, MS4 activities and periodic inspections. 						