Rule 13 - MS4 ANNUAL REPORT

State Form 51278 (R5 / 7-12)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

For questions regarding this form, contact:
IDEM Office of Water Quality , Storm Water Program
MS4 Coordinator
100 North Senate Avenue, Room 1255
MC 65-42
Indianapolis, IN 46204-2251
Telephone: (317) 234-1601 or
(800) 451-6027, ext. 41601 (within Indiana)
Web Access: http://www.IN.gov/idem/4903

NOTE:
- Annual reports must be submitted to the Indiana Department of Environmental Management. **Failure to submit the annual report is considered noncompliance with your permit.**
- For the **first five** (5)-year permit term, this completed form must be submitted by 1 year from the SWQMP – Part C submittal date and, thereafter, 1 year from the previous report (i.e., in years two (2) through five (5) of permit coverage).
- In the **second and subsequent** five (5)-year permit terms, this completed form must be submitted in years two (2) and four (4) of permit coverage.
- **Please type or print in ink.**
- Please answer all questions thoroughly and return the form by the due date.
- Return this form and any required attachments to the IDEM Storm Water Program, MS4 Coordinator at the address listed in the box on the upper-right.

Five Year Permit Term	Reporting Year
☐ 1st Permit Term ☒ Second and subsequent five (5) Year Permit Terms	Permit Year 2008 ☐ 1 ☐ 2 ☐ 3 ☒ 4 ☐ 5 MS4s in their first permit term must submit reports annually. MS4s that are in subsequent permit terms must submit in years 2 and 4 of the permit term.

PART A: GENERAL INFORMATION – MS4 OPERATOR

1. Permit Number: INR 0 4 0 037

Type of MS4:
☒ City
☐ Town
☐ County
☐ Non-traditional

2. MS4 Entity: City of Wabash
(Name of permit holder)

3. MS4 Operator: Mr. Rick Price

4. Mailing Address: Wastewater Treatment Facility
700 S. Carroll Street
Wabash, IN ZIP: 46992 County: Wabash

5. Email Address: rick_price1@cinergymetro.net

PART B: GENERAL INFORMATION – MS4 COORDINATOR

6. MS4 Coordinator (*please print*): Mr. Rick Price

7. Person's Title: MS4 Operator / Assitant Wastewater Treatment Plant Superintendent

8. Mailing Address: Wastewater Treatment Plant
700 S. Carroll Street
Wabash, IN ZIP: 46992

9. Telephone Number: (260) 563-2941

10. E-mail Address: rick_price1@cinergymetro.net

PART C: GENERAL INFORMATION – REPORT PREPARER

11. Name: Mr. Thomas J. Richeson
(*Provide this information if someone other than MS4 Operator or Coordinator completed this report.*)

12. Affiliation with the MS4: Consultant

13. Mailing Address: United Consulting
1625 N. Post Road
Indianapolis, IN ZIP: 46219

14. Telephone Number: (317) 895-2585 Extension: 1904

15. E-mail Address: tomr@ucindy.com

PART D: PROGRAM MANAGEMENT
327 IAC 15-13-18

16. Provide a summary of the following program management activities performed during the reporting period:
    a) If this is a co-permit, list all permittees and operators responsible for permit implementation for each entity.
    b) Identify changes to the MS4 area boundaries, including areas added to or lost to the MS4 area via annexation or other similar means. Provide a current map (8.5" X 11" or 8.5" X 14")
    c) Identify follow-up or additional water quality characterizations completed during the reporting period if applicable.
    d) Provide updated receiving water information completed during the reporting period if applicable.
    e) Identify funding sources (utility fees, grants, enforcement fines etc) utilized for MS4 program implementation during this reporting period.
    f) Provide a list of new active industrial sites identified during this reporting period.
    g) Provide a list of facilities owned and operated by the MS4 that require Rule 6 (industrial storm water) permits.
    h) Provide a summary of complaints received and follow-up investigation results related to storm water quality issues during this reporting period.
    i) Other:

a) The City of Wabash is the sole permit holder and responsible entity for permit implementation.
b) MS4 area boundaries have not changed from that previously delineated. The MS4 Boundary Map for the City of Wabash is attached (the map is also included as Appendix 2 of the SWQMP).
c) Does not apply.
d) Does not apply.
e) The City of Wabash utilizes existing stormwater and sanitary sewer rates to fund and implement the MS4 program and improvement projects.
f) New active industrial sites are located at the City's Northeast Business Complex located along the west side of SR 13, approximately one-fourth mile northeast of US 24.
g) Does not apply.
h) The City of Wabash records and files storm water complaints and subsequent resolution. Minimal complaints were received during this reporting period. One of the complaints involved standing water at a residential property during storm events; investigation discovered a partially clogged storm sewer, which the City of Wabash jetted/cleaned to remove debris and reinstate proper drainage. The City of Wabash conducts regularly scheduled storm and sanitary sewer inspections and cleanings to allow sewer flow capacities as designed and minimize the potential for restrictions to occur. Another complaint claimed improper storm water discharge from an adjacent property; the properties were located outside of the City of Wabash MS4 Boundaries; however, the City of Wabash investigated and responded to suggest possible resolution options. One complaint concerned standing water in a low area on private property.

PART E: PUBLIC EDUCATION AND OUTREACH - MINIMUM CONTROL MEASURE
17. **Identify the best management practices (BMPs) for public education and outreach included in your Storm Water Quality Management Plan (SWQMP) Part C and then respond to the following:** a) Identify progress made towards development and implementation of each BMP for this minimum control measure (MCM) including timetables and measurable goals during this reporting period. b) Describe implementation problems encountered and changes made due to ineffectiveness or infeasibility during this reporting period. c) Describe program BMPs that went beyond those identified in the SWQMP. d) Identify storm water BMPs installed or initiated for this MCM during this reporting period. e) Describe program implementation partnerships and explain successes and barriers during this reporting period. f) Other:

BMP 1: Public Attitude / Educational Surveys have previously been utilized to gauge residential, employee, commercial/industrial, and construction businesses. Although believed useful, low and declining survey participation has been typical with each sector, except that of City of Wabash employees. The City of Wabash is developing new cost effective strategies to implement in an effort to help gauge public attitude and promote further education and outreach in these sectors.

BMP 2: MS4 information is published in the local newspaper (The Wabash Plain Dealer) in connection with the City of Wabash effort to provide educational material to constituents. Locations of brochures concerning storm water pollution and anti-littering are indicated to be available at the locations listed in the newspaper advertisement. The City of Wabash Ordinance concerning The Control of Site Soil Erosion, Sediment, and Other Wastes and Storm Water Runoff (City General Ordinance No. 8, 2005) is mentioned in articles, as well as a map indicating the storm water outlet / inlet locations within the City. Finally, a contact telephone number is listed for the MS4 Operator, for convenience of constituents.

The regularly published article indicates that the State of Indiana has required the City of Wabash to develop and implement an informational program with educational materials for informing constituents about the impacts of polluted storm water run-off on water quality, and ways they can minimize their impact on storm water quality. The City of Wabash is meeting State and Federal requirements to assess citizen's knowledge of current storm water related issues, including pollution prevention. The City of Wabash has contacted area schools and provided information for review and distribution to a group of students. The City of Wabash anti-Littering Public Information Flyer is available at the Wastewater Treatment Plant, Chamber of Commerce, Public Library, City Hall and the Visitors Center. Progression of this program has included the passing of an Ordinance Amending Chapter 9, to Provide For The Control of Construction Site Soil Erosion, Sediment, and Other Wastes and Storm Water Runoff (General Ordinance No. 8). Said Ordinance is available at the City Hall (202 S. Wabash) for review. Developments impacting areas greater than one acre will be required to meet these local and State requirements. A map with City of Wabash storm water outlet /inlet locations is available for review by Contacting the MS4 Operator at (260) 563-2941.

It is believed that these newspaper publications present an important avenue to reach individuals who may not have the resources to readily obtain this valuable storm water information otherwise.

BMP 3: Storm Water Website: The information indicated in BMP 2 above is also provided on the City of Wabash web site. Other storm water information available for review that may be found on said website includes the City of Wabash 2010 Rule 13 Annual Report. In addition, web site links to other resources regarding the MS4 Program include: 1) IDEM Office of Water Quality Just for Kids; 2) Center for Watershed Protection; 3) IDEM Environmental Education Resources; 4) Indiana DNR Project WET; 5) Indiana DNR Hoosier RiverWatch and Adopt-A-River; 6) IDEM Office of Pollution Prevention and Technical Assistance; 7) Wabash County Solid Waste Management District.

The "After the Storm" brochure (as prepared by EPA) is also provided on the City of Wabash website. The EPA brochure is "A Citizen's Guide to Understanding Stormwater"; it defines storm water and explains the effects and types of pollution while indicating solutions to prevent related problems. The brochures also indicate the City of Wabash MS4 Operator's contact information (address and telephone number).

BMP 4: Proper Disposal of Hazardous Household Waste (HHW)

The Wabash County Solid Waste Management District (SWMD) provides recycling and a Hazardous Household Waste (HHW) drop-off site for the residents in Wabash County. The SWMD provides five drop of sites within the County Limits; three of these are located within the City of Wabash MS4 boundary. The SWMD's drop-off sites are unstaffed and as such, accurate participation data (number of patrons utilizing the sites) is not available

The SWMD's main facility is located at 1101 Manchester Avenue, Wabash, Indiana. This facility accepts problem wastes including chemicals, tires, appliances, electronics, propane tanks, fluorescent lamps, expired pharmaceuticals and batteries. The SWMD utilizes a 550 gallon container to accept used fluids such as motor oil, cooking oil, lubricants, transmission fluid, cutting oil, etc.

BMP 5: Trash Management

City of Wabash trash pickup occurs daily (Monday through Friday, excluding holidays). The City of Wabash street sweeping schedule is based on their trash pickup route, which is divided into five sections for the typical five day work week. Street sweeping is done one to two times per month. Additional street sweeping is provided on an as needed basis. The City of Wabash utilizes a Street Sweeping Daily Routes and Schedule; the schedule indicates the areas and days of the week typically cleaned, weather permitting.

Anti-littering brochures are available at the City of Wabash Wastewater Treatment Plant, Chamber of Commerce, Bureau of Tourism, City Hall Utility Office, and the Public Library. Brochures are replenished during periodic visits by the MS4 Operator, or when a low supply is reported by the staff individual at each location.

BMP 6: Classroom Education for School Age Children

The City of Wabash has continued to promote utilization of the Exploring with Environmental Ed (3rd to 5th Grade Edition) educational booklet as prepared by IDEM, in the Wabash City School District curriculum. The City of Wabash typically produces 250 copies of the booklet and provides them to the School District for distribution and usage by the teachers and children. In addition, the City of Wabash

typically provides five copies of the Water Quality Environmental Lesson Plan (Kindergarten to 8th Grade Edition as prepared by IDEM) for use by the educators. The City of Wabash has informed the School District that the State has developed other water pollution prevention materials and programs to promote awareness. The City of Wabash has suggested that school administrators visit the Indiana Department of Environmental Education Resources' web site and promote children and parents to take advantage of other educational information on the web site, which includes activities, lesson plans, coloring books and interactive quiz games.

The City of Wabash also typically provides the School District with information concerning the Indiana Department of Natural Resources (IDNR), Division of Soil Resources, Indiana Project Wet details. The information provided includes Project Wet's mission, goal, approach, and the website address. Other information provided includes State Science Standards correlation and an indication of other useful tools including educational guides, events, links, loaner items, workshops and other areas of IDNR.

It is reiterated with the School District that the City of Wabash is committed to public education and outreach concerning storm water pollution prevention, and suggests that the School District contact the City of Wabash MS4 Operator with any questions, comments, or desire for additional information.

Pleasantly, the School District has expressed that the booklets and information provided by the City of Wabash has served a useful purpose in storm water education of their students, teachers, and other school staff. The School District has commented on their appreciation to continually receive the storm water education material for inclusion into their curriculum.

In addition, the City of Wabash has proudly hosted guided student tours at their Wastewater Treatment Facility. For example, 25 seventh grade science class students were separated into two smaller groups for a 45 minute tour in 2011. Basic facility functions were simplified for review, with a stressed importance of clean water discharge to the Wabash River. The tour included safe passage through certain areas of the plant, including the control building to highlight computerized equipment and process monitoring, semi-automated control operations, and laboratory procedures to comply with Indiana Department of Environmental Management National Pollutant Discharge Elimination System Permit and associated quality regulated safe water discharges.

Another tour consisting of 43 senior and junior science class students from the City of Wabash High School was conducted in the earlier part of this year. Likewise, the students were separated into two groups and guided by certified wastewater treatment plant operators. Treatment processes and plant operations were expanded beyond those for the younger students. The tour duration for each of the senior and junior science class groups was approximately one and one-half hours.

BMP 7: Brochures for Visitors

Brochures and information concerning storm water pollution prevention continues to be made available for interested visitors at the Bureau of Tourism and the Public Library. Said brochures are regularly stocked and serve as an important source of public education and outreach.

BMP 8: Library of Educational Materials

The City of Wabash storm water educational materials are available for public and visitor review during normal business hours or as otherwise arranged. Brochures are available at the City Visitors Center, City Utility Office, City Building Commissioner's Office and the Public Library. The City Hall and the Wastewater Treatment Plant maintains more comprehensive information concerning the City of Wabash MS4 Program. Other various information from the IDEM, the US EPA and other various groups regarding storm water pollution and pollution prevention issues is available at these locations as well.

Other: The City of Wabash has not currently established a MS4 partnership.

PART F: PUBLIC PARTICIPATION AND INVOLVEMENT - MINIMUM CONTROL MEASURE

18. **Identify the best management practices for public participation and involvement included in your SWQMP Part C and then respond to the following:**
    a) Identify progress made towards development and implementation of each BMP for this MCM including timetables and measurable goals during this reporting period.
    b) Describe implementation problems encountered and changes made due to ineffectiveness or infeasibility during this reporting period.
    c) Describe program BMPs that went beyond those identified in the SWQMP.
    d) Identify storm water BMPs installed or initiated for this MCM during this reporting period.
    e) Describe program implementation partnerships and explain successes and barriers during this reporting period.
    f) Other:

BMP 1: Adopt-A-River Program

The City of Wabash continues to expand upon public awareness of programs that are currently available through different State agencies. The City of Wabash has not directly participated in an IDNR Adopt-A-River Program; however, The City of Wabash is a "major donor" and participates in Stream Cleanup and Volunteer Monitoring (see BMP 5 below).

BMP 2: Public Attitude / Educational Surveys

Surveys have previously indicated between 17% and 25% of individuals that would be interested in participating in a community wide storm water pollution project such as stream / river bank clean-up or sampling. It is difficult to gauge how many of these individuals or un-surveyed individuals have participated in organized river cleanups or self-promoted activities to reduce storm water pollution directly with trash removal from waterways or banks.

The City of Wabash actively promotes public attendance at their regularly scheduled Storm Water Utility Board Meetings, Board of Public Works and Safety Meetings, and City Council Meetings. Each of these meetings present an open forum for storm water questions and/or problem presentation for attendees.

BMP 3: Community Hotlines

Constituents may report illegal dumping and ask questions concerning storm water related issues by contacting the City of Wabash MS4 Operator. The MS4 Operator's contact information (telephone number) has been published in the newspaper, indicated on public educational brochures/flyers, and identified on the City of Wabash website.

BMP 4: Restoration Programs

The City of Wabash Park Department continues to work towards the goal of increasing the number of trees on city properties, as well as replacing fallen trees when the need arises.

BMP 5: Stream Cleanup and Volunteer Monitoring

The City of Wabash is a "major donor" to the Wabash River Defenders, who are volunteers committed to preserving, protecting, and defending the Wabash River. Organized events with team (water and land) development and deployment tactics are conducted at least annually to remove and properly dispose of undesirables from the waterway, banks, and adjacent areas.

Surveys, newspaper articles and website information have provided awareness of programs that are currently available through different State agencies. The City of Wabash cannot accurately track all privately organized storm water pollution prevention projects, such as stream/river bank clean-up or sampling. The most recent recorded event (July 28, 2012) removed 40,629 pounds (30.21 tons) from the Wabash River; 58% of the material was recycled and 42% was disposed of properly in the landfill.

PART G: ILLICIT DISCHARGE DETECTION AND ELIMINATION - MINIMUM CONTROL MEASURE

19. **Identify the best management practices for illicit discharge detection and elimination (IDDE) included in your SWQMP Part C and then respond to the following:**
    a) Identify progress made towards development and implementation of each BMP for this MCM including timetables and measurable goals during this reporting period (mapping, screening, etc.).
    b) Describe implementation problems or challenges encountered, particularly as it relates to mapping and screening of outfalls during this reporting period.
    c) Identify changes made to the IDDE Plan during this reporting period if applicable.
    d) Identify updates or revisions to IDDE ordinance or other regulatory mechanism made during this reporting period.
    e) Describe level of mapping and screening completed to date. If there are unmapped or unscreened outfalls, provide a plan and a timetable for completion.
    f) Other:

The City of Wabash approved their Illicit Discharge and Connection Storm Water Ordinance (Ordinance No. 17) on October 2, 2004. The Ordinance is reviewed periodically and has been revised (outfall monitoring revision) on one occasion.

The City of Wabash has also implemented an Illicit Discharge Detection and Elimination (IDDE) Plan; a copy of such is attached to this report. In association with the plan, the City of Wabash has identified by number hundreds of stormwater outfalls. The City of Wabash is proceeding with a new computerized mapping system and anticipates including outfall numbering, as another stride is completed to enhance their IDDE implementation plan. The City of Wabash will monitor numbered and other outfalls under their IDDE Plan.

In addition, the City of Wabash participates in the Indiana 811 Program (Call Before You Dig), and utilizes the program to assist in tracking potential drainage issues within their boundaries. The City of Wabash thoroughly investigates any "locate" that involves sewer work of any type.

Stream sampling (E coli) and analysis has been conducted at various locations within the City of Wabash MS4 boundaries as well.

BMP 1: Failing Septic Systems

The City of Wabash is attentive to visual screening for failing septic systems in areas of concern, or if suspicion is reported and warrants investigation in other areas. No failing septic systems were discovered during this reporting period.

BMP 2: Identifying Illicit Connections

No illicit connections were identified through visual inspections nor did any constituents report such during this reporting permit.

BMP 3: Illegal Dumping

The City of Wabash Anti-Littering Public Information Flyer explains that open dumping is the improper and illegal disposal of regulated solid waste at an unpermitted site. Some of the prohibited wastes are listed on the Flyer; however, it is noted that a full list of prohibited items can be obtained at the IDEM Office of Land Quality. The Flyer informs that violations and local & federal penalties may apply to illegal solid waste disposal. Citizens are encouraged by the Flyer to take part in recycling and any events that are hosted by the City of Wabash, Wabash County, or surrounding communities for special waste disposal. It is noted that to report illegal dumping or obtain more information, citizens may contact Indiana's Illegal Solid Waste Disposal Laws Office, the City of Wabash MS4 Operator, IDEM's Office of Land Quality, or the Office of Pollution Prevention and Technical Assistance; contact information for these entities is provided in the City of Wabash Anti-Littering Public Information Flyer, which has been distributed to the City of Wabash Wastewater Treatment Plant, Chamber of Commerce, Bureau of Tourism, City Hall Utility Office, and the Public Library.

BMP 4: Industrial / Business Connections

Visual inspections have not detected any inappropriate industrial or commercial wastewater connections to the City of Wabash storm drain system during this reporting period. Screening has continued during this reporting period during discharge.

BMP 5: Sanitary Sewer Overflows

The City of Wabash has one crew that cleans sanitary, storm, and combination sewer lines daily in an effort to reduce potential plugging and unnecessary pollution. This maintenance reduces the potential for sanitary sewer overflows. The City of Wabash owns two Vactor trucks that are utilized to clean sanitary, storm, and combination sewers. The addition of a recently purchased "new" Vactor truck is primarily utilized to accomplished routinely scheduled maintenance and be readily available to respond should an emergency need transpire. The second Vactor truck is properly maintained to the highest level and supplementary utilized when needed to assist with sewer system maintenance, or other conditions, including scheduled maintenance periods for the "new" Vactor truck.

BMP 6: Wastewater Connections to the Storm Drain System

Illegal cross connections between the waste source and the storm sewer have continued to be investigated as part of the dry weather screening process. No illicit connections were identified during this this reporting period. The City of Wabash Illicit Discharge and Connection Discharge Storm Water Ordinance addresses this matter to provide for the health, safety, and general welfare of the citizens through the regulation of non-storm water discharges to the storm drainage system.

PART H: CONSTRUCTION SITE STORM WATER RUN-OFF CONTROL - MINIMUM CONTROL MEASURE

20. List the best management practices for the construction site storm water run-off program identified in your SWQMP Part C and then respond to the following:

a) Identify progress made towards development and implementation of each BMP for this MCM including timetables and measurable goals during this reporting period.

b) Describe program implementation partnerships and explain successes and barriers during this reporting period.

c) Identify the number of construction sites permitted during this reporting period and identify the number and type of enforcement actions taken against construction site operators during the same period.

d) Identify the number and types of training opportunities that were provided to contractors, developers, and builders during this permit period.

e) MS4 personnel responsible for plan review, inspection, and enforcement of construction activities shall receive, at a minimum, annual training addressing appropriate control measures, inspection protocol, and enforcement procedures. Identify training provided to MS4 personnel responsible for these activities during this reporting period.

f) Identify updates or revisions to the storm water construction ordinance or other regulatory mechanism made during this reporting period.

g) Other:

The IDEM (Mr. Robert Beck and Ms. Sue Bock) Construction Run-Off Minimum Control Measure Audit was conducted earlier this year on June 19, 2012. The audit included review (in part) of inspection reports, letters of violation/compliance, enforcement measures, plan review procedures, and persons of responsibility. Two site visits were conducted on the day of the audit by the City of Wabash, with IDEM personnel accompanying.

BMP 1: Develop and Adopt an Erosion and Sediment Control Ordinance

The City of Wabash previously passed an Ordinance to Provide for the Control of Construction Site Soil Erosion, Sediment, and Other Wastes and Storm Water Runoff. (General Ordinance No. 8, 2005). The public has been informed through the newspaper that the Ordinance is available at the City Building for review. The Ordinance gives the authority to the City of Wabash to require erosion and sediment control plans for new developments, to inspect new development sites and to require compliance with the local ordinance and 327 IAC 15-5. The Ordinance and the Certificate of the Development, Implementation, Management, and Enforcement of an Erosion and Sediment Control Program for the Construction Site Storm Water Run-Off Control MCM, State Form 51272 (R2 / 11-03), was submitted to the IDEM Rule 13 Coordinator on November 3, 2005.

The City of Wabash reviews the Ordinance periodically to determine if any revisions are necessary. There have currently been no revisions to said Ordinance.

BMP 2: Required BMP's per the Indiana Stormwater Quality Manual

The Ordinance indicates that the plans and BMPs used to satisfy the conditions of the Comprehensive Storm Water Management Plan shall meet the standards and specifications in the most current edition of the Indiana Storm water Quality Manual (formerly known as the Indiana Handbook for Erosion Control in Developing Areas). Further, the plans must make use of the practices that preserve the existing natural condition to the Maximum Extent Practicable. The City of Wabash can require additional or alternative planning and storm water management if deemed necessary to further protect water quality, adjacent property Owners, or the City of Wabash sewer system.

BMP 3: Provide Training for Construction Site Contractor

The City of Wabash has informed construction site contractors through newspaper advertisements, brochures, and surveys, that new ordinances and submittal procedures will be required by the City of Wabash in connection with controlling construction site soil erosion, sediment, and other wastes and storm water runoff during construction. These requirements are in effect as the State previously provided formal written transfer of review authority to the City of Wabash. Training of construction site contractors will occur as necessary during the plan submittal and review process for specific construction conditions.

BMP 4: Train MS4 Inspectors and Plan Reviewers

The City of Wabash MS4 Operator typically attends the MS4 Annual Meeting and various seminars at such.

In addition, the MS4 Operator attended the Rule 13 Permit Compliance Workshop for Understanding and Preparing for the IDDE Evaluation, held in the City of Columbia City on August 23, 2011.

BMP 5: Community Hotline

The City of Wabash Storm System Complaint Form was previously developed to record the specific incident, inspection, and action taken. Complaints that were received during this reporting period are reviewed above in Part D, Item 16.f (see Page No. 2). No construction site storm water run-off control complaints were received.

PART I: POST-CONSTRUCTION STORM WATER RUN-OFF CONTROL - MINIMUM CONTROL MEASURE

21. **List the best management practices for post-construction storm water run-off control identified in your SWQMP Part C and then respond to the following:**
    a) Identify progress made towards development and implementation of each BMP in the SWQMP including timetables and measurable goals during this reporting period.
    b) Describe implementation problems encountered and changes due to ineffectiveness or infeasibility during this reporting period.
    c) Describe program implementation partnerships and explain successes and barriers.
    d) MS4 area personnel responsible for implementation of the post-construction minimum control measure shall receive, at a minimum, annual training. Identify training provided for this minimum control measure during this reporting period.
    e) Identify updates or revisions to the post-construction storm water ordinance or other regulatory mechanism made during this reporting period.
    f) Other:

The City of Wabash has implemented an Ordinance to Provide for the Control of Construction Site Soil Erosion, Sediment, and Other Wastes and Storm Water Runoff (General Ordinance No. 8, 2005), which was submitted to IDEM on November 3, 2005. This information completed the Postconstruction Storm Water Management MCM Submittal.

BMPs for post-construction storm water run-off control identified in the SWQMP Part C (Updated June 2011) include review of the erosion and sediment control ordinance, the requirement to follow the Indiana Storm Water Quality Manual, training for construction site contractors and MS4 inspectors, and continuance of a community hotline for reporting of storm water related questions or concerns. The City of Wabash has implemented these BMPs and reviews such periodically for revisions that may improve this MCM.

Inspections are conducted by the City of Wabash MS4 Operator to insure post-construction compliance with the related City of Wabash Ordinance and Structural BMPs.

PART J: MUNICIPAL OPERATIONS POLLUTION PREVENTION AND GOOD HOUSEKEEPING - MINIMUM CONTROL MEASURE

22. List the best management practices for municipal operations pollution prevention and good housekeeping identified in your SWQMP Part C and respond to the following:

a) Identify progress made towards development and implementation of each BMP in the SWQMP including timetables and measurable goals during this reporting period.

b) Describe implementation problems encountered and changes due to ineffectiveness or infeasibility as it relates to pollution prevention and good housekeeping at MS4 owned and operated facilities during this reporting period.

c) Identify storm water BMPs installed or initiated at MS4 owned and operated facilities.

d) Identify and describe appropriate storm water training provided to MS4 employees. Employees are required to have a minimum training once per year.

e) Other:

BMP 1: Annual Training for Municipal Employees on Pollution Prevention and Good Housekeeping

Periodically, the City of Wabash reviews its training material for municipal employees in connection with proper vehicle maintenance, fertilizer, pesticide and herbicide application, fuel storage and spill prevention, pollution material spill prevention and clean up, and other miscellaneous training issues.

The City of Wabash tracks the number of employees attending training through attendance sheets, retains copies of all training materials, and records the amount of time dedicated to training.

BMP 2: Standard Operating Procedures (SOP) for Spill Prevention and Cleanup

The City of Wabash previously developed a Standard Operating Procedures (SOP) for Spill Prevention and Cleanup. The SOP identifies the proper spill containment wall or spill trays and the annual (minimum) inspection, as the responsible for each of the Department Heads. The SOP also covers annual training of all employees, contact information for emergencies, spill removal from within the containment wall or spill tray, the blockage procedure to prevent the spilled material from entering the sewer waterway. Chemicals stored inside or over a paved area outside, along with dry containment techniques to prevent materials from entering drains, are included in the SOP plan.

BMP 3: Street Sweeping

The City of Wabash utilizes a street sweeping schedule and tracking procedure consistent with the approved City of Wabash CSO Operational Plan. One City of Wabash street sweeping crew is utilized daily as weather permits. Waste from the City of Wabash street sweeper is placed in a bin at the Street Department Garage and, as necessary, placed in a dumpster and ultimately disposed of properly at a landfill.

BMP 4: Develop and Implement a Good Housekeeping Improvements Plan

The City of Wabash educates and reviews good housekeeping practices with their Fire, Street, Park, Police, and Wastewater Departments. All Departments have the necessary spill cleanup materials readily available on-site. Personnel in all Departments have been trained in the use of spill cleanup

materials. The Street Department oversees this good housekeeping aspect at the Police and Fire Department facilities.

All of the Departments that have containment walls, spill trays, cabinets, and/or tanks, are proactively inspected for defects.

The City of Wabash Standard Operating Procedures for Spill Prevention and Cleanup is posted in the office and any common room (such as the garage area, etc.). Police and Fire Department personnel have been trained to immediately contact the Street Department for assistance should any spill occur.

Vehicle maintenance and logs of such are completed regularly to prevent the potential of fluid leaks. Personnel are trained that should a leak occur, prompt and thorough cleanup is essential to prevent contamination.

BMP 5: Catch Basin and Storm Sewer Cleaning

The City of Wabash utilizes two Vactor trucks to clean catch basins and storm sewers, along with sanitary and combination sewers. Material removed from the Vactor trucks is placed in a containment area at the City of Wabash Wastewater Treatment Plant for proper subsequent disposal.

Other: The City of Wabash is proceeding with CSO mitigation in accordance with their LTCP

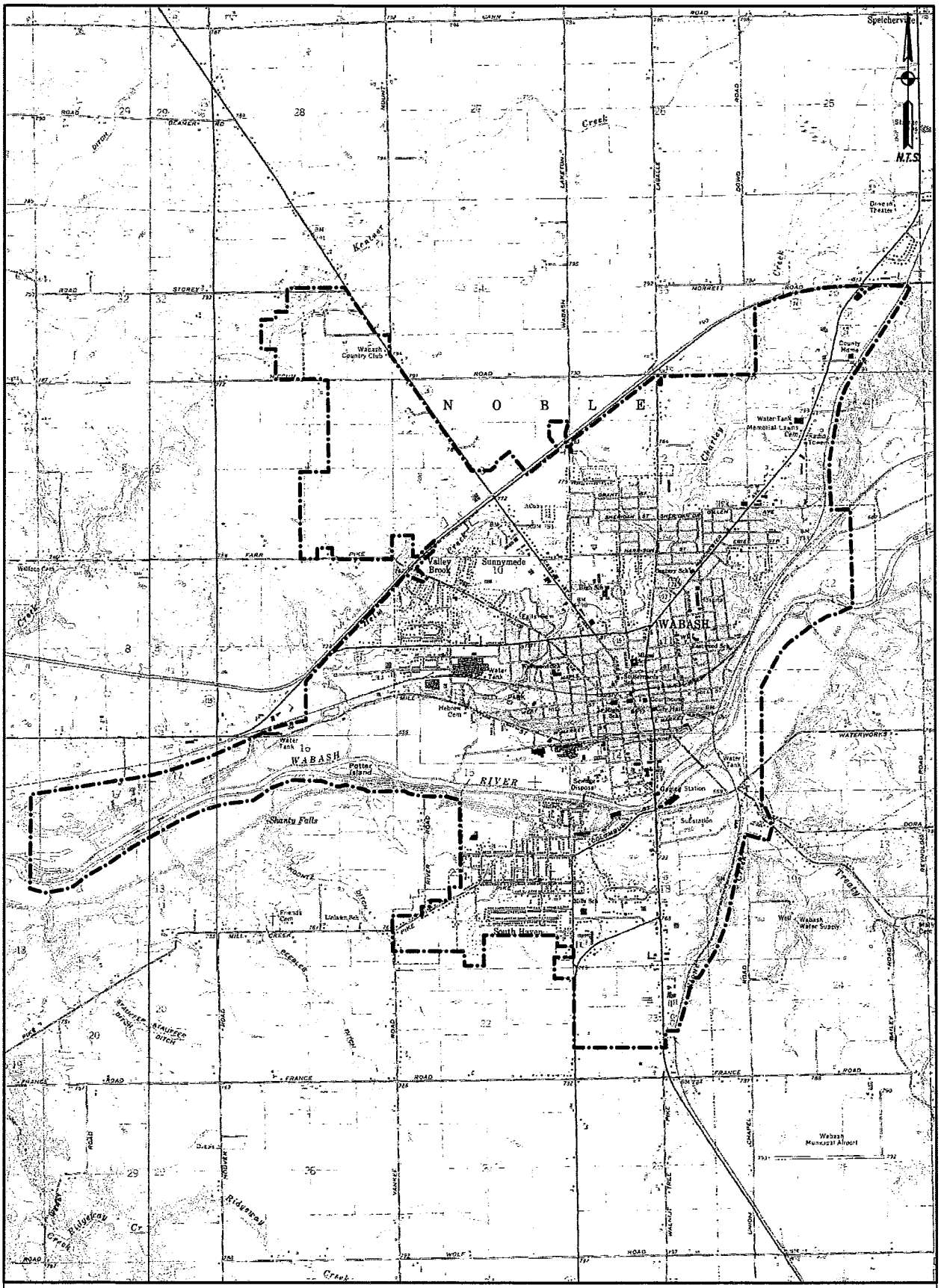
PART K: CERTIFICATION AND SIGNATURE

The individual listed in "PART A: GENERAL INFORMATION – MS4 OPERATOR" must sign the following certification statement:

"By signing this annual report, I hereby certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Type or Print Name: Rick Price

Signature Rick Price 10/01/2012
(mm/dd/yyyy)



LEGEND

CORPORATE LIMITS

APPENDIX 2
MS4 BOUNDARY MAP
WABASH, INDIANA

N.T.S.

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ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PLAN
CITY OF WABASH, INDIANA
PERMIT # INR040054

Illicit Discharge Detection and Elimination (IDDE) Plan

This plan contains the City of Wabash's strategy to detect and eliminate illicit discharges to the MS4 conveyance system in accordance with the City 's Stormwater Quality Management Plan (SWQMP) as required by 327 IAC 15-13 (Rule 13). This plan includes a storm sewer mapping plan and schedule, illicit discharge definitions, an outfall screening procedure, a source identification procedure, a list of permitted industrialfacilities that discharge into the City's MS4, and a master implementation schedule.

STORM SEWER MAP DEVELOPMENT

As required by 327 IAC 15-13-14 and governed by the city's inclusion of all provisions of IC 8-1.5-5-28 in the relevant city ordinance, the City of Wabash must map all known stormwater outfall conveyance systems under the MS4 Operator's control with a pipe diameter of twenty-four (24) inches or larger and open ditches with a two (2) foot or larger bottom.

Outfall is defined as a point source discharge via a conveyance of storm water run-off into a water of the state.

Conveyance is defined as any structural process for transferring storm water between at least two (2) points, including piping, ditches, swales, curbs, gutters, catch basins, channels, storm drains, and roadways.

The City of Wabash is currently in the process of inventorying by outfall numbering on current maps all storm water outfalls of all sizes.

Future storm water outfalls, whether city or developer constructed, will also be included in this system. Currently required submittals will allow for these updates during annual map revisions.

ILLICIT DISCHARGE

The term "illicit discharge" is defined in IAC 327 15-13-5 (28) as any discharge to an MS4 conveyance system that is not composed entirely of stormwater, except naturally occurring floatables, such as leaves or tree limbs. The definition provides examples of illicit discharges such as sanitary wastewater, septic tank effluent, car wash wastewater, oil disposal, radiator flushing disposal, laundry wastewater, roadway accident spillage, and household hazardous wastes.

Illicit discharges can be categorized as either direct or indirect. Examples of direct illicit discharges include sanitary wastewater; piping directly connected from a home to the storm sewer; materials (e.g., used motor oil) that have been dumped illegally into a storm drain catch basin; a shop floor drain that is connected to the storm sewer; or a cross-connection between the sanitary sewer and storm sewer systems. Examples of indirect illicit discharges include a damaged sanitary sewer line that is leaking into a storm sewer line or a failing septic system that is leaking into a storm sewer line or causing surface discharge into the storm sewer.

As stated in IAC 327 IAC 15-13-14 (d), the City of Wabash's SWQMP need not address the following categories of non-storm water discharges or flows unless the MS4 operator identifies them as significant contributors of pollutants to the MS4 conveyance system. Therefore, in the interim, the City will not consider those items listed in **Table 1** as illicit discharges. However, if in the future the City determines any of these activities to be illicit discharges, the City will update its IDDE Plan accordingly.

Table 1
Exempt Non-stormwater Discharges
Water Line Flushing Irrigation Water
Landscape Irrigation Springs
Diverted Stream Flows Water from Crawl Space Pumps
Rising Ground Waters Footing Drains
Uncontaminated Ground Water Infiltration Lawn Watering
Uncontaminated Pumped Ground Water Individual Residential Car Washing
Discharges from Potable Water Sources Flows from Riparian Habitats and Wetlands
Foundation Drains Dechlorinated Swimming Pool Discharges
Air Conditioning Condensation Street Wash Water
Discharges from Firefighting Activities

DRY WEATHER OUTFALL SCREENING

As required by Rule 13 and IC 8-1.5-5-28, the City of Wabash will perform dry weather screening of its stormwater outfalls with a pipe diameter of twenty-four (24) inches or larger and open ditches with a two (2) foot or larger bottom.

Screening activities will begin in 2012 in conjunction with the City's mapping efforts. Additional screenings may be required depending upon the results of the initial inspections. The City will also conduct outfall screening in response to community complaints, as deemed appropriate. Outfall inspectors will begin screening outfalls in those areas of the City that contain significant industrial facilities as well as those areas of the City that may possibly still utilize septic systems to some extent.

The City will perform screening only during dry weather. The City defines dry weather as a period in which there has been no rainfall or no more than one-tenth (0.1) of an inch of rain within a seventy-two (72) hour period. The inspector will conduct and document physical observations at each outfall. For those outfalls proceeded by a retention pond, the inspector will conduct and document physical observations of the conveyance that leads to the pond.

In the event an outfall or pond conveyance system is discharging during dry weather and the physical observations warrant, the inspector will conduct and document a series of in-field water quality tests. If physical observations and in-field tests suggest water quality problems, the inspector may choose to collect a sample for further laboratory analyses. The outfall inspector will utilize the city's MS4 outfall inspection checklist. The water quality parameters to be tested are listed in **Table 2**.

Table 2
Water Quality Test Parameters, Uses & Test Methods
Conductivity Used as an indicator of dissolved solids. Conductivity Meter in Field
pH Extreme pH values (low or high) may indicate commercial or industrial flows; not useful in determining the presence of sanitary wastewater (which, like uncontaminated baseflows, tends tohave a neutral pH) pH Meter In Field

Ammonia-Nitrogen High levels can be an indicator of the presence of
sanitary wastewater.Field Test Kit
Temperature Sanitary wastewater and industrial cooling water
can substantially influence outfall discharge temperatures. This measurement is most useful during cold weather.Temperature Meter
Phosphorus Used to indicate the presence of sanitary
wastewater. Field Test Kit
E. coli Used to indicate the presence of sanitary
wastewater. Coliscan Easygel
Optical Brighteners Used to indicate the presence of laundry detergents (which often contain fabric whiteners,which cause substantial fluorescence).Untreated cotton pad surrounded by mesh bagplaced in storm drain outlet, manhole, or catch basin; left for 5-7 days.
Then, cotton pad placedunder UV lamp.

SOURCE IDENTIFICATION

The City of Wabash will attempt to determine the source of all dry weather discharges. However, recognizing that most dry weather discharges will not be constant, the City understands that identifying the source of 100% of all illicit discharges is unlikely.
For each dry weather discharge suspected of being illicit, the inspector, utilizing a map of the storm sewer system, will follow the drainage ditch or identify the most up-pipe manhole with a junction in an attempt to identify the general location from which the discharge originates. The inspector may opt to collect additional field and laboratory samples as he or she make their way upstream or up-pipe in order to compare the outfall sample results with the in-line results in hope of identifying similarities between the sites. If, from following the drainage ditch or inspecting the manhole, the inspector can determine the direction from which the discharge originates, he or she will then continue upstream or to the next up-pipe manhole until he or she can pinpoint the source or the general vicinity from where the discharge is originating. If the inspector cannot identify the specific source through visual observation, video inspection, a dye test or smoke test will be necessary to determine the source of the discharge.

Video Inspection
Video inspections involve filming the storm sewer system and tracking a discharge to its source. The City of Wabash owns and routinely operates its own sewer videoing equipment. Typically the proper use of this equipment will lead to a source very early on therefore video inspection will be the first step after visual observation.

Dye Testing
If an inspector is able to narrow down the likely source of a discharge to a reasonable number of homes or businesses, the City will perform a dye test one building at a time.

Non-toxic dye will be flushed into toilets, sinks and other non-stormwater sources. Storm sewer outfalls will be observed to check for presence of the dye. Prior to testing, the City will contact building owners and occupants to obtain access to the buildings. Two or more City staff will be equipped with two-way radios with one person inside the suspected building and the others stationed at appropriate manholes and/or outfalls. The inside person will drop dye into a plumbing fixture and run a sufficient amount of water to move the dye through the plumbing system. The inside person will then radio the outside crew so they can watch for the dye and record the presence or absence of dye. Dye can also be used in conjunction with Video Inspection.

Smoke Testing

If dye tests prove unsuccessful, the City may opt to conduct smoke testing. A smoke test involves injecting non-toxic smoke into storm sewer lines and then noting the emergence of smoke from sanitary sewer vents in illegally connected buildings or from cracks and leaks in the storm sewer lines. The injection will be done by placing a smoke bomb in the storm sewer manhole below ground and forcing air in after it. City staff will be stationed at points of suspected illegal connections or cracks/leaks, noting any escape of smoke. Prior to performing tests, the City will inform building owners and occupants in the area, as well as, police and fire departments.

IDENTIFICATION OF PERMITTED INDUSTRIAL FACILITIES IN THE MS4 AREA

All PERMITTED industrial facilities located within the City of Wabash's MS4 area that discharge into a City MS4 conveyance are listed in **Table 3**. This information will be updated annually by the City to ensure the list is accurate and current. The table will assist City personnel with identifying potential pollutants of concern as well as the potential sources of illicit discharges.

Table 3
Permitted Industrial Facilities in the MS4 Area

Miami Wabash Paper
Ford Meter Box Company Incorporated
Aleris Specification Alloys
Martin Yale Industries
Wabash Valley Landfill

ELIMINATING ILLICIT DISCHARGES

The goal of the City of Wabash's IDDE Plan is to address 100% of the illicit discharges identified. The City understands, however, that for a variety of reasons, immediate elimination of 100% of identified discharges is not likely. The City will attempt to eliminate all identified illicit discharges in accordance with the City's Illicit Discharge Elimination Ordinance.

Illicit Discharge Detection and Elimination Reporting

The inspectors responsible for outfall screening and identifying illicit discharges will maintain a database that documents all activities associated with the City's IDDE Plan ranging from mapping, outfall screening, source identification and enforcement. All activities associated with this plan will be documented.

IDDE Education and Outreach
The City of Wabash will make a reasonable effort to educate public employees, businesses, and the general public within the MS4 area about the hazards associated with illicit discharges and the improper disposal of waste. The Ciity will provide relevant education through brochures,newsletters, website and newspaper articles.

Complaints
The City of Wabash has implemented a program to field complaints from the public on illegal dumping, illicit discharges, poor erosion control, and other activities that negatively impact stormwater quality. Citizens have the opportunity to submit such complaints by filling out a form currently available in person at the Wastewater Treatment Plant office and ultimately to be available online at the revised and updated City web page. Available currently is the email address of the Superintendent for filing any concerns online.
The City of Wabash documents the number of brochures distributed and picked up as part of outreach and education programs and uses a web counter to track the number of times the web page is viewed, the number of complaints received, and document follow up on citizen reports, corrections taken, etc.

IDDE Plan Review and Update
Every five (5) years, beginning in 2012, the City of Wabash IDDE Plan will be reviewed for adequacy and accuracy and updated as necessary. The City will attempt to include relevant City personnel in this process.