Wetlands and Storm Water Section

Storm Water Program
Office of Water Quality

Indiana Department of Environmental Management

Municipal Separate Storm Sewer System (MS4)

Minimum Control Measure Audit:

- Public Education and Outreach
- Public Participation and Involvement

Authority:

This inspection was conducted pursuant to Indiana Code (IC) 13-14-2-2 and is consistent with the requirements of IC 13-14-5.

Date of Audit: 7/20/23 **Report Issued:** 7/25/23

Audit Conducted By: Staci Goodwin

Report Prepared By: Staci Goodwin, MS4 Coordinator

This audit report is a cumulative overview of the MS4 program for the public education and outreach (MCM 1) and public participation and involvement (MCM 2) minimum control measures. The report provides general background information, observations, recommendations, and requirements. The purpose of these audits is to identify program areas where an MS4 can improve program implementation, but to also identify deficiencies and/or violations that will require the MS4 to respond or address within specified timelines.

address within specified timelines.				
M	S4 Responsible Party a	<mark>nd Location I</mark>	nformation	
MS4 Name: Town Highland		MS4 Permit Number: INR040135		
MS4 Operator: Tom Black Town council president		County: Lake		
MS4 Coordinator:	75	Contact Info	Contact Information:	
Tim Gembala	,	8001 Kenned	y Ave	
Present at Audit: Mark Knesek, Tim Gembala				
Section A: Publi	c Education, Participat	ion, Outreach	and Involvement Review	
✓ Sufficient☐ Deficient☐ Not Applicable	1. How often is the plan for MCM 1 and MCM 2 reviewed and revised?			
Comments: They do a review as part of the annual report.				
Recommendations:			4	
Requirements:				
Sufficient□ Deficient□ Not Applicable	2. What is the plan to reach the constituents with educational materials? What is the plan to reach the constituents with opportunities to participate in the storm water management process?			
Comments: Literature for schools and coloring books. They have a daycare center they work with. It is available at town hall and the library. They have a website and are currently working on updating the website with new information. They have put articles on the website. They are going to put a form on the website for stormwater issues. They are part of NISWAG. They do work with businesses on issue. They have a Hazardous Waste day. They are a county recycle hub.				
Recommendations: Look more toward	ds commercial and HOA	outreach.		
Requirements:				
Sufficient□ Deficient□ Not Applicable	3. What are the measurable goals and how are they being tracked?			
Comments: They track recycling infor	rmation. They provide lit	terature so have	e counts of that.	
Recommendations: Look at ways to b	etter track measurable go	oals.	*	
Requirements:				
	Section B: Au	dit Summary		
Overall comments and information:	The MS4 is meeting the	requirements f	or MCMs 1 and 2.	
Recommendations:		227	*	

Requirements: No corrective actions needed. Action by IDEM: Failure to address and/or respond to deficiencies and/or violations may result in further action by IDEM including, but not limited to a compliance meeting and/or a non-compliance letter. As warranted, IDEM will perform follow-up inspections and/or program audits to assess compliance. **Section C: Audit Information** Questions and the submittal of documents in response to this report should be directed to: Staci Goodwin Office Phone: 317-234-1601 **IDEM MS4 Coordinator** Cell Phone: 317-502-0120 **E-Mail:** sgoodwin@idem.In.gov 100 North Senate Avenue Toll Free: 1-800-451-6027 Indianapolis, Indiana 46204 Report distributed: ⊠ Email Mail ☐ Via Certified Mail: Report provided to: Tim Gembala, MS4 Coordinator Randy Braun, CPESC, CPMSM - Section Chief Storm Water and Wetlands Programs

Wetlands and Storm Water Section Storm Water Program

Office of Water Quality

Indiana Department of Environmental Management

Municipal Separate Storm Sewer System (MS4)

Minimum Control Measure Audit:

Illicit Discharge, Detection, and Elimination

Authority:

This inspection was conducted pursuant to Indiana Code (IC) 13-14-2-2 and is consistent with the requirements of IC 13-14-5.

Date of Audit: 7/20/23 **Report Issued:** 7/25/23

Audit Conducted By: Staci Goodwin

Report Prepared By: Staci Goodwin, MS4 Coordinator

This audit report is a cumulative overview of the MS4 program for the pollution prevention and good housekeeping minimum control measure. The report provides general background information, observations, recommendations, and requirements. The purpose of the audit is to identify program areas where an MS4 can improve program implementation, but to also identify deficiencies and/or violations that will require the MS4 to respond or address within specified timelines.

to also identify deficiencies and/or vio	olations that will require the MS4 to resp	ond or address within specified timelines.		
MS4 Responsible Party and Location Information				
MS4 Name: Town of Highland		MS4 Permit Number: INR040135		
MS4 Operator: Tom Black Town Co	ouncil President	County: Lake		
MS4 Coordinator:	Contact Information:			
Tim Gembala	8001 Kennedy Ave			
Present at Audit: Mark Knesek, Tim Gembala				
	Section A: Program Overview	7		
☐ Sufficient☐ Deficient☐ Not Applicable	 (1) How often is the IDDE process reviewed? • When is the SWQMP review for IDDE completed? • How often is the SWQMP updated for IDDE? 			
Comments: Reviewed not deficience Recommendations: Requirements:	es found.			
Sufficient□ Deficient□ Not Applicable	 (2) What ordinances have been developed? How often are these ordinances reviewed? Are there issues that are not being addressed by ordinances? Are there plans for new ordinances? 			
Comments: Current ordinances avail				
ordinances.	meet new permit requirement needs to be	e developed. Look at LTAP model		
Requirements:				
	B: Employee Training and Private Se			
Sufficient	(1) Provide documentation of employee IDDE training?How often is training reviewed and revised?			
☐ Deficient ☐ Not Applicable	 How often is training reviewed a How are training needs determin 			
Comments: Documented training no	deficiencies found			
Recommendations: Add titles to form				
Requirements:				
☐ Sufficient☐ Deficient☐ Not Applicable	(2) Provide documentation of IDDE ea • How often is the process to reach	ducation to the public and industries. In the public and industries reviewed?		
Comments: Reviewed not deficiencie	es found.			
Recommendations:				

Requirements:		
	Section C: Storm Water Infrastructure	
Sufficient□ Deficient□ Not Applicable	(1) Provide documentation that all outfalls a 327 IAC 15-13.How are subdivisions addressed?How are annexed areas addressed?	re mapped in accordance with
Comments: Reviewed no deficiencies	s found. They update maps as needed approxi	mately every 1.5 years.
Recommendations:		
Requirements:		
☐ Sufficient☐ Deficient☐ Not Applicable	(2) How are industrial stormwater discharge	rs identified?
Comments: They identify them through	gh building department. No large industries.	
Recommendations:		
Requirements:		
	Section D: IDDE Detection	
Sufficient	(1) How are IDDE problems located?	
Deficient	How are all outfalls screened for IDDFHow often are all outfalls screened for	
Not Applicable		
Comments: They have a document the that they will use that has this informations:	ey use but does not have issue tracking or corrition. They will send me this form.	rective actions. They have a new form
Requirements:		
Sufficient	(2) How are IDDE issues resolved?	
Deficient	How are IDDE issues resorved: How are IDDE enforcements actions c	ompleted?
☐ Not Applicable		•
	esidence. They report internally through directe is always filled out.	et supervisor. This is all done through
Recommendations:		
Requirements:		
	Section E: Audit Summary	
Overall comments and information: Recommendations: Requirements: No corrective action r	The MS4 is meeting the requirements for MC	2M 3.
	and/or respond to deficiencies and/or violation	as may result in further action by IDEM
	nce meeting and/or a non-compliance letter. A	
	Section F: Audit Information	
Questions and the submittal of docu	ments in response to this report should be o	lirected to:
Staci Goodwin	Office Phone: 317-234-1601	
IDEM MS4 Coordinator	Cell Phone: 317-502-0120	E-Mail: sgoodwin@idem.In.gov
100 North Senate Avenue Indianapolis, Indiana 46204	Toll Free: 1-800-451-6027	-0
Report distributed:		
	fied Mail:	
Report provided to:		

- Tim Gembala, MS4 Coordinator
- Randy Braun, CPESC, CPMSM Section Chief Stormwater and Wetlands Programs

Wetlands and Storm Water Section Storm Water Program Office of Water Quality Indiana Department of Environmental Management		Authority: This inspection was conducted pursuant to Indiana Code (IC) 13-14-2-2 and is consistent with the requirements of IC 13-14-5.	
		Date of Aud	
Municipal Separate Storm Sewer		Report Issu	
 MS4 Owned/Operated Facility The inspection is being control 			lucted By: Staci Goodwin
	to assess permit complianc		pared By: Staci Goodwin, MS4 Coordinator
The hispection is routine			
MC4 Names Town of Highland	MS4 Responsible Part	ty and Location I	MS4 Permit Number: INR040135
MS4 Name: Town of Highland			
MS4 Coordinator: Tim Gembal			County: Lake
MS4 Facility Inspected: Street Department		Contact Informati 001 Kennedy	on:
Present at Inspection: Tim Gembala			
	Section A: I	Facility Operation	ns
Sufficient			water pollution prevention plan (SWPPP) on
Deficient			n provided SWPPP training with periodic
☐ Not Applicable			the training and how detailed? Is a map of the is the SWPPP and map updated?
Recommendations: Add detail t Requirements:	o map Section B: Facility	y Grounds Manag	gement
☐ Sufficient☐ Deficient☐ Not Applicable	management pra		
Comments: Visually inspected a Recommendations: Requirements:	nd no deficiencies found.		
☐ Sufficient☐ Deficient☐ Not Applicable		2. Are regular inspections of the grounds, outfalls, and storm drains documented? Are they in need of repair? Are storm drains labeled and free of debris?	
Comments: Visually inspected a Recommendations: Requirements:	nd no deficiencies found.		
	Section C: Material Sto	orage and Waste I	Management
Sufficient			l storm water contaminants stored under cover
Deficient	•		e all containers properly labeled? Is there a plan
Not Applicable	in place for con	in place for containment of spills or accidental losses?	
Comments: Visually inspected a	nd no deficiencies found.		
Recommendations:			
Requirements:			
Sufficient	2. Are outdoor sto	ckpiles, salt/sand,	composting material, or any other potentially

Deficient

Not Applicable
 ■

contaminating material stored outside properly stored, maintained and regularly

inspected? Is there a plan in place for containment of spills or accidental losses?

Comments:	
Recommendations:	
Requirements:	
	Section D: Fleet, Fuel, Vehicle Maintenance
☐ Sufficient☐ Deficient☑ Not Applicable	1. Is written documentation kept of vehicle maintenance, spills and clean-up? Are spill kits located within the vehicle maintenance area? Are all products properly labeled, contained, and disposed of properly?
Comments	
Recommendations:	
Requirements:	
☐ Sufficient☐ Deficient☑ Not Applicable	2. Are vehicles washed on site? Where does the water discharged? Are there storm water measures in place to treat wash water?
Comments:	
Recommendations:	
Requirements:	
☐ Sufficient☐ Deficient☐ Not Applicable	3. Are regular inspections conducted and documented at fueling stations? Are there storm drains located near the fueling station? Are spill kits located near fueling areas?
Comments: Visually inspected and no	deficiencies found.
Recommendations:	
Requirements:	
Section	n E: Pesticide, Herbicide, Fertilizers, and Algaecides
∑ Yes □ No	
Sufficient□ Deficient□ Not Applicable	1. Are certified operators used? Are applicators MS4/utility employees or contracts? Where are Pesticides, Herbicides, Fertilizers and Algaecides (PHFA) stored? Are PHFA's stored and labeled properly? Is proper cleanup of spills documented? What is the disposal process and procedure?
Comments: Visually inspected and no	o deficiencies found.
Recommendations:	
Requirements:	
	Section F: Facility Inspection Summary
Sufficient Deficient	
Overall comments and information: actions needed. Recommendation: Requirements:	Corrective actions completed prior to issuance of report. No additional corrective
	and/or respond to deficiencies and/or violations may result in further action by IDEM nce meeting and/or a non-compliance letter. As warranted, IDEM will perform ance.
•	Section G: Inspection Information
Questions/Inquiries Concerning this	Report Should be Directed to:
Staci Goodwin	Office Phone: 317-234-1601 E-Mail: sgoodwin@idem.In.gov
IDEM MS4 Coordinator	Cell Phone: 317-502-0120
100 North Senate Avenue Indianapolis, Indiana 46204	Toll Free: 1-800-451-6027
Report distributed on:	

⊠ Email	Mail	☐ Via Certified Mail:
Report pro	vided to:	
Tim Gemba	ıla, MS4 Coo	ordinator
Randy Brau	ın, Section C	hief Storm Water and Wetlands Programs

Wetlands and Storm Water Section

Storm Water Program Office of Water Quality

Indiana Department of Environmental Management

Municipal Separate Storm Sewer System (MS4)

Minimum Control Measure Audit:

Pollution Prevention and Good Housekeeping

Authority:

This inspection was conducted pursuant to Indiana Code (IC) 13-14-2-2 and is consistent with the requirements of IC 13-14-5.

Date of Audit: 7/20/23 Report Issued: 7/25/23

Audit Conducted By: Staci Goodwin

Report Prepared By: Staci Goodwin, MS4 Coordinator

This audit report is a cumulative overview of the MS4 program for the pollution prevention and good housekeeping minimum control measure. The report provides general background information, observations, recommendations, and requirements. The purpose of the audit is to identify program areas where an MS4 can improve program implementation, but to also identify deficiencies and/or violations that will require the MS4 to respond or address within specified timelines.

to also identify deficiencies and/of vio	rations that will require the 19154 to res	pond of address within specifica timelines.	
M	S4 Responsible Party and Location I	nformation	
MS4 Name: Town of Highland		MS4 Permit Number: INR040135	
MS4 Operator: Tom Black Town Co	uncil President	County: Lake	
MS4 Coordinator:	Contact Information:		
Tim Gembala	8001 Kennedy Ave		
Present at Audit:			
Man Knesek, Tim Gembala			
	Section A: Program Overview	w	
Sufficient Sufficient		ation process reviewed? When are SWQMP	
☐ Deficient	and SWPPP reviews completed? How often are they updated?		
☐ Not Applicable			
Comments: Reviewed no deficiencie	s found.		
Recommendations:			
Requirements:			
Sufficient	2. What measurable goals have been developed? How have your goals		
Deficient	reduced pollution entering the storm water system or waterways? How often are these goals reviewed?		
Not Applicable			
Comments: They have measurable goals that are associated with clean up street sweeping and hazardous waste.			
	als for impact to Water Quality and TM	DLs.	
Requirements:		2.20.1.1	
Sufficient	3. Is this a combined sewer system addressed?	em? If it is how are the different parts of the	
Deficient Not Applicable	of stell data esset.		
Not Applicable			
Comments: Recommendations:			
Requirements:			
Sufficient	4. Provide a list of all municipal	ly owned and operated facilities	
Deficient	7. I Tovide a list of all municipal	ry owned and operated facilities.	
Not Applicable			
Comments: Reviewed no deficiencies	s found.		
Recommendations:	. 20 50200		
Requirements:			
Sufficient	5. How are non-municipally ow	ned industrial areas addressed in the MS4	
Deficient	area?		
	l		

☐ Not Applicable	
Comments: Reviewed no deficiencies	s found.
Recommendations:	
Requirements:	
	Section B: Employee Training
Sufficient	1. Provide documentation of employee pollution prevention training. How often is
Deficient	training reviewed and revised? How are training needs are determined?
Not Applicable	
Comments: Reviewed no deficiencie	es found.
Recommendations: Requirements:	
	Section C: Storm Water Infrastructure
Sufficient Sufficient	1. Provide documentation that mapping and a characterization of MS4 system is
☐ Deficient	current. Provide an electronic map of the facility that includes boundaries of the
Not Applicable	MS4, conveyances and outfalls.
Comments: Reviewed no deficiencies	s found.
Recommendations:	
Requirements:	
Sufficient	2. Provide documentation of storm water system cleaning, maintenance, and
Deficient	material disposal procedures.
Not Applicable	
1	asin tracking on ipads. They previously did a written form. They do cleaning of the
Recommendations:	consent decree. Street sweeping is in dumpster at facility.
Requirements:	
- Acoquiromonis	Section D: Flood Control Maintenance
Sufficient	1. Are new flood management projects being designed or planned to include water
Deficient	quality considerations?
Not Applicable	
Comments:	
Recommendations:	
Requirements:	
	Section E: Facility Inspection
Sufficient	1. Provide copies of inspection sheets for maintenance inspections, and procedures
Deficient	for facility operations.
Not Applicable	
Comments: Reviewed no deficiencies	·
Recommendations: Add corrective a	ctions.
Requirements:	
Section F: Pesti	cide, Herbicides, and Fertilizer Application and Management
Sufficient	1. Does the MS4 apply restricted pesticides/herbicides that require certification by
Deficient	the Indiana State Chemist Office? If yes are the proper certifications in place
Not Applicable	and staff applying product identified and have proper certification.
Comments: They have licenses. They	have copy.
Recommendations:	

Requirements:		
	Section C. Complaints	
	Section G: Complaints	
Sufficient Sufficient	1. How are complaints related to MS4	facilities and infrastructure received and
☐ Deficient	processed? How are complaints trace	cked and addressed?
Not Applicable		
Comments: Reviewed no deficiencies	s found.	
Recommendations:		
Requirements:		
	Section H: Audit Summary	
Overall comments and information:	The MS4 is meeting the requirements for	or MCM 6.
Recommendations:		
Requirements: No corrective action n	eeded.	
Additional inspections completed as completed.	part of this audit: Street Department an	d Parks Department facilities inspection
Attachments:		
	nce meeting and/or a non-compliance lett	lations may result in further action by IDEM ter. As warranted, IDEM will perform
	Section I: Audit Information	
Questions and the submittal of docu	ments in response to this report should	be directed to:
Staci Goodwin	OCC DI 217 224 1/01	
IDEM MS4 Coordinator	Office Phone: 317-234-1601	
100 North Senate Avenue	Cell Phone: 317-502-0120	E-Mail: sgoodwin@idem.In.gov
Indianapolis, Indiana 46204	Toll Free: 1-800-451-6027	
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Tim Gembala, MS4 Coordinator		
Randy Braun, CPESC, CPMSM -	Section Chief Storm Water and Wetlands	s Programs

*				
Wetlands and Storm Water Section Storm Water Program Office of Water Quality Indiana Department of Environmental Management			Authority: This inspection was conducted pursuant to Indiana Code (IC) 13-14-2-2 and is consistent with the requirements of IC 13-14-5.	
			Date of Aud	it: 7/20/23
Municipal Separate Storm Sewer Syste MS4 Owned/Operated Facility Ins	pection		Report Issue Audit Condu	ed: 7/25/23 ucted By: Staci Goodwin
☐ The inspection is being conduc☐ The inspection is routine to ass	•	l l		
M	S4 Responsible P	arty an	d Location I	ıformation
MS4 Name: Town of Highland				MS4 Permit Number: INR040135
MS4 Coordinator: Tim Gembala				County: Lake
MS4 Facility Inspected: Street Department		ļ	i ct Informati o Kennedy	on:
Present at Inspection: Tim Gembala				
	Section A	: Facili	ity Operation	S
SufficientDeficientNot Applicable	1. Is a copy of the facility storm water pollution prevention plan (SWPPP) on site? Have the employees been provided SWPPP training with periodic refresher sessions? What is the training and how detailed? Is a map of the facility provided? How often is the SWPPP and map updated?			
Comments: Reviewed no deficiencies found. Recommendations: Add detail to map				
Requirements:				
	Section B: Facil	lity Gro	ounds Manag	ement
Sufficient	1. Is there any e	evidence	e of storm wat	er run-off leaving the perimeter? Are
Deficient	management practices installed and maintained? How many storm water drains			
Not Applicable are there at the facility? Do the storm drains discharge to storm sewers or streams?				
Comments: Visually inspected and no	deficiencies found	d.		
Recommendations:				
Requirements:	T			
Sufficient	2. Are regular inspections of the grounds, outfalls, and storm drains documented?			
Deficient Not Applicable	Are they in need of repair? Are storm drains labeled and free of debris?			
Comments: Visually inspected and no	deficiencies found	d.		
Recommendations:				
Requirements:				
Sec	tion C: Material S	Storage	and Waste M	Ianagement
N Sufficient	1 Ama all matan	iala that	t ava matantial	starm water contaminants stared under cover

1. Are all materials that are potential storm water contaminants stored under cover or in secondary containment? Are all containers properly labeled? Is there a plan Deficient in place for containment of spills or accidental losses? Not Applicable Comments: Visually inspected and no deficiencies found. **Recommendations:** Requirements: Sufficient 2. Are outdoor stockpiles, salt/sand, composting material, or any other potentially contaminating material stored outside properly stored, maintained and regularly Deficient inspected? Is there a plan in place for containment of spills or accidental losses? Not Applicable

Comments:	
Recommendations:	
Requirements:	
	Section D: Fleet, Fuel, Vehicle Maintenance
☐ Sufficient☐ Deficient☐ Not Applicable	1. Is written documentation kept of vehicle maintenance, spills and clean-up? Are spill kits located within the vehicle maintenance area? Are all products properly labeled, contained, and disposed of properly?
Comments	
Recommendations:	
Requirements:	
☐ Sufficient☐ Deficient☐ Not Applicable	2. Are vehicles washed on site? Where does the water discharged? Are there storm water measures in place to treat wash water?
Comments:	
Recommendations: Requirements:	
Sufficient Deficient Not Applicable	3. Are regular inspections conducted and documented at fueling stations? Are there storm drains located near the fueling station? Are spill kits located near fueling areas?
Comments: Visually inspected and no	deficiencies found.
Recommendations:	
Requirements:	
Section	E: Pesticide, Herbicide, Fertilizers, and Algaecides
⊠ Yes □ No	
☐ Sufficient☐ Deficient☐ Not Applicable	1. Are certified operators used? Are applicators MS4/utility employees or contracts? Where are Pesticides, Herbicides, Fertilizers and Algaecides (PHFA) stored? Are PHFA's stored and labeled properly? Is proper cleanup of spills documented? What is the disposal process and procedure?
Comments: Visually inspected and no	deficiencies found.
Recommendations:	
Requirements:	
	Section F: Facility Inspection Summary
Sufficient Deficient	
Overall comments and information: actions needed. Recommendation: Requirements:	Corrective actions completed prior to issuance of report. No additional corrective
	and/or respond to deficiencies and/or violations may result in further action by IDEM nce meeting and/or a non-compliance letter. As warranted, IDEM will perform ance.
	Section G: Inspection Information
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Randy Brau	n, Section C	hief Storm Water and Wetlands Programs

Version: December 31, 2015

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