Village of Lynwood

IEPA NPDES General Permit No. ILR40-0380

Storm Water Management Program (SWMP)

For discharges from Small Municipal Separate Storm Sewer Systems (MS4)

April 2018 to March 2021 May 3, 2018

A. General Information

1. Storm Water Management Program contact:

Name: Mr. Robert A. Myers
Title: Director of Public Works

Mailing Address: Village of Lynwood

21460 Lincoln Highway Lynwood, IL 60411

Village Number: 708-758-6101 Public Works Dept.: 708-758-8434

Email Address: bmyers@lynwoodil.us

2. State Authority Contact:

Name: Mr. Alan Keller, PE

Title: Manager, Permit Section

Mailing Address: Illinois Environmental Protection Agency

Division of Water Pollution Control

Permit Section P. O. Box 19276

Springfield, IL 62794-9276

Email Address: epa.ms4noipermit@illinois.gov

B. Governmental entities in which MS4 is located:

Cook County

C. Names of known receiving waters:

- 1. Lansing Ditch
- 2. Lansing Ditch Lynwood Tributary
- 3. Lansing Ditch Torrence Tributary





D. Storm Water Management Program Requirements:

- 1. The [Village] must develop, implement, and enforce a storm water management program designed to reduce the discharge of pollutants from [its] small municipal separate storm sewer system (MS4) to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Illinois Pollution Control Board Rules and Regulations (35 Ill. Adm. Code, Subtitle C, Chapter 1) and the Clean Water Act. The storm water management program must include the 6 Minimum Control Measures (MCMs). The U.S. Environmental Protection Agency's National Menu of Storm Water Best Management Practices (http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm) and the most recent version of the http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm) and the most recent version of the http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm) and the most recent version of the https://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm) and the most recent version of the https://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm) and the most recent version of the https://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm) and the selection of appropriate BMPs.
- 2. You may partner with other MS4s to develop and implement your storm water management program.
- 3. For further details on the requirements for each of the 6 MCMs, please refer to the latest version of the General NPDES Permit No. ILR40.

E. Minimum Control Measures (MCMs):

- 1. Public Education and Outreach (MCM 1)
- 2. Public Participation/Involvement (MCM 2)
- 3. Illicit Discharge Detection and Elimination (MCM 3)
- 4. Construction Site Runoff Control (MCM 4)
- 5. Post-Construction Runoff Control (MCM 5)
- 6. Pollution Prevention/Good Housekeeping (MCM 6)





F. Minimum Control Measures (MCMs):

A. Public Education and Outreach	D. Construction Site Runoff Control
A.1 Distributed Paper Material	D.1 Regulatory Control Program
A.2 Speaking Engagement	D.2 Erosion and Sediment Control BMPs
A.3 Public Service Announcement	☐ D.3 Other Waste Control Program
A.4 Community Event	D.4 Site Plan Review Procedures
A.5 Classroom Education Material	☐ D.5 Public Information Handling Procedures
A.6 Other Public Education	D.6 Site Inspection/Enforcement Procedures
	D.7 Other Construction Site Runoff Controls
B. Public Participation/Involvement	
B.1 Public Panel	E. Post-Construction Runoff Control
B.2 Educational Volunteer	☐ E.1 Community Control Strategy
B.3 Stakeholder Meeting	
	E.3 Long Term O&M Procedures
B.5 Volunteer Monitoring	E.4 Pre-Const Review of BMP Designs
☐ B.6 Program Coordination	
⊠ B.7 Other Public Involvement	
	☐ E.7 Other Post-Const Runoff Controls
C. Illicit Discharge Detection and Elimination	
	F. Pollution Prevention/Good Housekeeping
	F.1 Employee Training Program
☐ C.3 Detection/Elimination Prioritization Plan	F.2 Inspection and Maintenance Program
	F.3 Muni Operations Storm Water Control
	F.4 Municipal Operations Waste Disposal
C.6 Program Evaluation and Assessment	F.5 Flood Management/Assess Guidelines
	F.6 Other Municipal Operations Controls
C.8 Pollutant Field Testing	
C.9 Public Notification	

<u>Statement of Fairness</u> – All BMPs shall and will be implemented, conducted, regulated, or enforced fairly throughout the entire Village as appropriate and applicable.

Revisions – BMPs C3, C4, and C5 were added to the program in 3/2018.





1. Public Education and Outreach

A1: Distributed Paper Material (Newsletters or Brochures)

1. Description of BMP:

The Village <u>Newsletter</u>, *Lynwood Community Update*, will be used to provide storm water awareness and cleanup information on a variety of topics to the public. Public Works items, duties, and concerns may also be highlighted from time to time. The newsletters and event flyers will be posted on the Village website.

2. Target Audience: Village residents and business owners

3. Measurable Goals:

- a. Quantity of articles
- b. Frequency of distribution
- c. Public awareness

4. Schedule:

- a. Ongoing
- b. Articles to be included at least two times per year
- c. Begun in previous cycles

A3: Public Service Announcement (Cable TV)

1. <u>Description of BMP</u>:

The Village's Public Service Cable Channel TV station (as long as it is online) will be used to post stormwater awareness information on a daily basis. The notices will be changed periodically and run continuously on a 24/7 basis.

2. <u>Target Audience</u>: Village residents

3. Measurable Goals:

- a. Number of notices
- b. Public awareness
- c. Reduction in stormwater related problems

- a. Ongoing
- b. Runs 24/7
- c. Begun in previous cycles





A4: Community Event (Village-wide Cleanup Week)

1. Description of BMP:

The Village will hold an annual Village-wide Cleanup Week in the spring. All residents can participate by putting out used oils, paints and other fluids for pickup by the Village. Residents are also asked to put out debris for pickup—debris that would otherwise be blown around or thrown into fields, ditches or sewers.

2. <u>Target Audience</u>: Village residents

3. Measurable Goals:

- a. Items collected
- b. Debris reduction
- c. Improved awareness

4. Schedule:

- a. Annual event
- b. Runs for one week in the spring (typically May)

A6: Other Public Education (Website)

1. <u>Description of BMP</u>:

The Village website will be used throughout the year to post a variety of stormwater, flooding, and public works information. Information regarding public services such as garbage collection, yard waste pickup, leaf pickup, annual cleanup week, etc. will be posted.

2. Target Audience: Village residents and business owners

3. Measurable Goals:

- a. Website hits and usage
- b. Public awareness

- a. Ongoing
- b. To be used throughout the year
- c. Begun in previous cycles





2. Public Education and Outreach

B4: Public Hearing

1. Description of BMP:

The Village will hold an annual informational <u>Public Hearing</u> that will be used to inform the public about such topics as the MS4 program, stormwater, flooding, pollution control, etc. The forum for the meeting will be before or during a typical Board/Council meeting. The meeting will be publicized in the local newspaper and minutes will be taken.

2. Target Audience: Village residents and Board/Council members

3. Measurable Goals:

- a. Number of participants
- b. Public awareness
- c. Meeting agendas and minutes

4. <u>Schedule</u>:

- a. Ongoing
- b. Hold public hearing annually
- c. Begun in previous cycles

B7: Other Public Involvement (Village-wide Cleanup Week)

1. <u>Description of BMP</u>:

The Village will hold an annual Village-wide Cleanup Week in the spring. All residents can participate by putting out used oils, paints and other fluids for pickup by the Village. Residents are also asked to put out debris for pickup—debris that would otherwise be blown around or thrown into fields, ditches or sewers.

2. Target Audience: Village residents

3. Measurable Goals:

- a. Items collected
- b. Debris reduction
- c. Improved awareness

- a. Annual event
- b. Runs for one week in the spring (typically May)





MCM₃

3. Illicit Discharge Detection and Elimination

C1: Storm Sewer Map Preparation

1. Description of BMP:

The Village has a Storm Sewer Map on which the outfalls are numbered and storm sewer sizes are included. The map was last updated in May 2014. The map should be reviewed annually and updated as needed.

2. Measurable Goals:

- a. Review annually
- b. Update storm sewer atlas

3. Schedule:

- a. Review atlas on an annual basis
- b. Perform file update (as needed) at least once every 5 years.

C2: Regulatory Control Program (Ordinance)

1. Description of BMP:

The Village maintains various ordinances for Illicit Discharge Detection and Elimination, which are available on the Village's website (or upon request). The Code includes, but is not limited to the following sections that apply to this MCM:

- Unlawful Dumping (refuse) is discussed in Article IV, Section 34-182
- Waste Collection and various penalties in Article II, Sections 86-19 through 86-32
- Other penalties in Section 30-158

2. Measurable Goals:

- a. Ordinance effectiveness
- b. Current applicability

- a. Ongoing enforcement of all Village ordinances
- b. Review the regulatory program and ordinance adequacy in Year 4 of the permitting cycle
- c. Adopt any changes at least once every 5 years, as needed





C3: Detection/Elimination Prioritization Plan (IDDE Procedures written 7/2015; BMP added 3/2018)

1. Description of BMP:

This BMP was not included in the Village's most recent Notice of Intent (NOI) dated 8/23/13, but was added in March 2018. The Village established written Illicit Discharge Detection and Elimination (IDDE) Procedures for outfall inspections in July 2015. Procedures include inspections, tracing procedures, and illicit source removal procedures. Periodically review the procedures for adequacy and make any updates or revisions as needed.

2. Measurable Goals:

- a. Procedures effectiveness
- b. Current applicability

3. <u>Schedule</u>:

- a. Established with ongoing enforcement
- b. Review the procedures for accuracy and applicability every third year or as needed
- c. Perform update (as needed) at least once every 5 years

C4: Illicit Discharge Tracing Procedures (added 3/2018)

1. Description of BMP:

This BMP was not included in the Village's most recent Notice of Intent (NOI) dated 8/23/13, but was added in March 2018. After outfall inspections under BMP C7 and typical storm sewer inspections, the source of any discovered contaminants or illicit discharges will be traced and investigated. Periodic inspection of residential, commercial or industrial areas should be conducted on an annual basis as may be necessary. Storm sewer systems should be inspected and cleaned where needed. Inspections and source tracing may also lead to recommended catch basin or inlet vacuuming/cleaning. Storm sewer jetting is an option in some circumstances.

2. Measurable Goals:

- a. Clean outfalls
- b. Removal of any illicit discharges

Schedule:

- a. Ongoing
- b. Conduct inspections annually and follow-up tracing as needed





C5: Illicit Source Removal Procedures (Locate and Eliminate Illicit Discharges; added 3/2018)

1. Description of BMP:

This BMP was not included in the Village's most recent Notice of Intent (NOI) dated 8/23/13, but was added in March 2018. After outfall inspections under BMP C7 and tracing procedures under BMP C4, any discovered contaminants or illicit discharges will be eliminated as much as is practicable. If tracing procedures lead to specific industrial or commercial areas as the source, proper warnings or notices will be given to property owners to cease causal activities.

2. Measurable Goals:

- a. Clean outfalls
- b. Removal of any illicit discharges

3. Schedule:

- a. Ongoing
- b. Conduct inspections annually and follow-up elimination as needed

C6: Program Evaluation and Assessment

1. Description of BMP:

This BMP is currently not included in the Village's NOI. This BMP may be implemented in the future.

2. Measurable Goals:

- a. n/a
- b. n/a

3. Schedule:

- a. n/a
- b. n/a

C7: Visual Dry Weather Screening

1. Description of BMP:

The dry weather screening program will consist of inspecting outfalls and logging the results on an appropriate inspection form. Photos of the outfalls will be taken. The target goal is that the Village outfalls are to be inspected at least every other year or approximately 50% of the outfalls will be inspected annually. Any discovered illicit discharges will flag the particular outfall for follow-up tracing and elimination procedures; however, these BMPs are not yet established.





2. Measurable Goals:

- a. Clean outfalls
- b. Inspection of outfalls

3. Schedule:

- a. Perform inspections in dry weather times throughout the year, but primarily in the summer or fall months
- b. Outfall inspections to be performed minimally every other year

C10: Other Illicit Discharge Controls (Visual Monitoring Inspections; added 4/2016)

1. Description of BMP:

Visual Monitoring Inspections at upstream and downstream locations along receiving watercourses will be performed as part of this BMP. This BMP may involve revision and future expansion to accommodate changing requirements.

2. Measurable Goals:

- a. Illicit discharge detection at upstream and downstream locations of watercourses
- b. Identification of potential source location

- a. Ongoing
- b. Annually





4. Construction Site Runoff Control

D1: Regulatory Control Program (Soil Erosion and Sediment Control Ordinance)

1. Description of BMP:

The Village Codes include the "Site Development Requirements" which include Erosion and Sediment Control (Section 46-61) and separate "Erosion and Sediment Control" requirements under the "Environmental" Chapter 34 — Article III. The codes include sections for violations and penalties. The Village continues to enforce these and other development codes through the plan review process. The Village codes and ordinances are posted on the website or available at the Village. Additionally, Article 4 of the Watershed Management Ordinance (WMO) used by MWRD is also in effect and regulates erosion and sediment control.

2. Measurable Goals:

- a. Ordinance enforcement through the plan review process
- b. Reduced soil erosion and sediment

3. Schedule:

- a. Ongoing enforcement
- b. Periodic review of ordinance effectiveness and applicability

D2: Erosion and Sediment Control BMPs

1. Description of BMP:

Erosion and Sediment Control BMPs are required under the current ordinances and these requirements are enforced through the plan review process. Required site BMPs will be reviewed for effectiveness. Consideration will be given for any changes in the requirements warranted due to new or emerging technologies.

2. Measurable Goals:

- a. Ordinance enforcement
- b. Reduced soil erosion and sediment

3. <u>Schedule</u>:

- a. Ongoing enforcement
- b. Periodic review of ordinance effectiveness and applicability





D4: Site Plan Review Procedures

1. <u>Description of BMP</u>:

Development plans will continue to be reviewed under local and county ordinances by Village Staff and/or engineering consultants, especially regarding stormwater and erosion and sediment control measures. Projects over one acre will continue to be required to submit a Notice of Intent prior to construction. A SWPPP is required with plan sets.

2. Measurable Goals:

- a. Ordinance enforcement
- b. Reduced soil erosion and sediment

3. Schedule:

- a. Ongoing enforcement
- b. Periodic review of ordinance effectiveness and applicability

D6: Site Inspection/Enforcement Procedures

1. Description of BMP:

Weekly inspection reports will continue to be required from developers of active projects. Periodic or surprise audit inspections are conducted by the Village as needed. The inspections will typically be documented on appropriate forms. Developers will be informed of any noted deficiencies in their site's erosion and sediment control measures. Copies of the documentation will be filed.

A graduated step approach with escalation in enforcement measures will be used to achieve compliance, such as initial reporting of deficiencies, notification of possible enforcement measures such as stop work orders and ticketing by the Police Department, drawing on Letter of Credit monies to have the measures implemented, and potential legal proceedings.

2. Measurable Goals:

- a. Ordinance enforcement
- b. Reduced soil erosion and sediment

3. <u>Schedule</u>:

- a. Ongoing enforcement
- b. Periodic inspections will be conducted as deemed necessary depending on level of activity at a site and on weather conditions
- c. Inspections of sites for which the Village is responsible will be conducted weekly and after 0.5" or greater rain events





5. Post-Construction Runoff Control

E2: Regulatory Control Program (Post Construction Management and Soil Erosion and Sediment Control Ordinance)

1. Description of BMP:

The Village codes include Division 5 – "Post-Construction Management." The Village continues to enforce these and other development codes through the plan review process. The Village codes and ordinances are posted on the website or available at the Village. Additionally, Article 4 of the Watershed Management Ordinance (WMO) used by MWRD is also in effect and regulates erosion and sediment control.

2. Measurable Goals:

- a. Ordinance enforcement through the plan review process
- b. Reduced soil erosion and sediment

Schedule:

- a. Ongoing enforcement
- b. Periodic review of ordinance effectiveness and applicability

E3: Long Term O&M Procedures

1. Description of BMP:

Long Term Operation and Maintenance Procedures related to erosion and sediment control are required under the current ordinance and these requirements are enforced during the plan review process prior to construction.

2. Measurable Goals:

- a. Ordinance enforcement
- b. Reduced soil erosion and sediment

3. Schedule:

- a. Ongoing enforcement
- b. Periodic review of ordinance effectiveness and applicability

E4: Pre-Construction Review of BMP Designs

4. Description of BMP:

Erosion and Sediment Control BMPs are required under the current ordinance and these requirements are enforced through the plan review process prior to





construction. Required site BMPs will be reviewed for effectiveness. Consideration will be given for any changes in the requirements warranted due to new or emerging technologies.

5. Measurable Goals:

- a. Ordinance enforcement
- b. Reduced soil erosion and sediment

6. Schedule:

- a. Ongoing enforcement
- b. Periodic review of ordinance effectiveness and applicability

E5: Site Inspections During Construction

1. Description of BMP:

Weekly inspection reports will continue to be required from developers of active projects. Periodic or surprise audit inspections will be conducted by the Village as needed during the construction process. The inspections will typically be documented on appropriate forms. Developers will be informed of any noted deficiencies in their site's erosion and sediment control measures. Copies of the documentation will be filed.

A graduated step approach with escalation in enforcement measures will be used to achieve compliance, such as initial reporting of deficiencies, notification of possible enforcement measures such as stop work orders and ticketing by the Police Department, drawing on Letter of Credit monies to have the measures implemented, and potential legal proceedings.

2. Measurable Goals:

- a. Ordinance enforcement
- b. Reduced soil erosion and sediment

- a. Ongoing enforcement
- b. Periodic inspections will be conducted as deemed necessary depending on level of activity at a site and on weather conditions
- c. Inspections of sites for which the Village is responsible will be conducted weekly and after 0.5" or greater rain events





E6: Post-Construction Inspections

1. <u>Description of BMP</u>:

Post-construction BMPs and facilities including storm sewer systems, grading, and stormwater detention facilities will be inspected after the sites are completed and the request for the acceptance of the development is received. Final inspections will be part of any newly constructed development.

Furthermore, the goal is to inspect the existing public and accessible private stormwater management systems throughout the year. Storm sewers and structures will be cleaned, vacuumed, or jetted as needed as part of the Good Housekeeping MCM.

2. Measurable Goals:

- a. Ordinance enforcement
- b. Determine items requiring routine maintenance as part of Good Housekeeping
- c. Reduced soil erosion and sediment

- a. Ongoing enforcement
- b. Developments will receive final acceptance and release of the development security only after punch lists and any deficiencies are corrected. The developments will also be inspected before the expiration of the maintenance bond that is put in place after acceptance.
- c. Inspect existing systems throughout the year





6. Pollution Prevention and Good Housekeeping

F1: Employee Training Program

1. Description of BMP:

Appropriate employees will be provided training for pollution prevention measures, such as training in the use of salt spreading, distribution rates, proper snow-plowing, procedures for disposal of oil, salt storage, fuel dispensing, handling of solvents and all maintenance yard Standard Operating Procedures (SOP's).

Appropriate employees will be provided refresher training or information to reinforce the established pollution measures in place. This may involve the use of various videos applicable to the subject matter or general NPDES compliance.

2. Measurable Goals:

- a. Conduct at least one training session per year
- b. Informed staff

3. Schedule:

Summer or fall on an annual basis

F2: Inspection and Maintenance Program

1. Description of BMP:

Routine inspection and maintenance of Village streets, storm sewers, storm inlets and catch basins, ditches, swales, and stormwater detention facilities are part of the typical Public Works responsibilities. This includes street sweeping, storm structure vacuuming, jetting, or repair, and debris, branch and leaf collection. Systems and facilities are primarily under continuous surveillance rather than on a rigidly established schedule; however, some scheduling is involved.

2. Measurable Goals:

- a. Keep Village systems in top operating condition
- b. Reduced pollutants or contaminants

Schedule:

- a. Ongoing and as needed
- b. <u>Street-sweeping</u> this will be performed during the months of May and June on main streets and side streets
- c. <u>Inlets/Catch Basins</u> will be inspected and maintained as needed throughout the year needed repairs may be performed in-house or by contractor –





- cleaning, when performed, is generally performed during the spring, summer or fall months
- d. <u>Storm sewers</u> will be inspected and cleaned or jetted on an as needed basis throughout the year – significant maintenance issues may not be able to be repaired immediately and may require special budgeting and scheduling depending on severity and impacts to drainage
- e. <u>Detention ponds/basins</u> Village-owned detention basins will be inspected periodically and maintained as needed debris will be cleared from outlets as necessary to promote proper drainage. Other detention basins will be similarly inspected and maintained if proper easements allow for Village access.
- f. <u>Culverts</u> if under Village control, will be inspected and debris removed as needed
- g. <u>Ditch, swale or creek cleaning</u> will be inspected and cleaned as needed as staffing allows

F3: Municipal Operations Storm Water Control

1. Description of BMP:

The BMPs for municipal operations for stormwater control will be reviewed for effectiveness and audited for compliance with the program. Revisions will be made as necessary. Typical municipal operations will continue to adhere to established and known stormwater control measures. Written SOP's will be reviewed annually.

2. Measurable Goals:

- a. Program effectiveness
- b. Program compliance
- c. Reduced pollutants or contaminants

3. Schedule:

- a. Ongoing
- b. Yearly review to take place in February or March

F4: Municipal Operations Waste Disposal

1. <u>Description of BMP</u>:

The BMPs for municipal operations for waste control will be reviewed for effectiveness and audited for compliance with the program. Revisions will be made as necessary. Typical municipal operations will continue to adhere to established and known waste disposal measures. Waste disposal is typically logged and may be handled directly by Village staff or through a contracted disposal service. Fluids such as oil and coolant from vehicle maintenance are collected and disposed of according





to typical methods as mentioned above and logged accordingly. Double or triple basins are routinely cleaned according to typical procedures. Spilled fuel is mopped up with an absorbent product or similar material and disposed of properly. Written SOP's are followed and reviewed annually.

2. Measurable Goals:

- a. Program effectiveness
- b. Program compliance
- c. Reduced pollutants or contaminants

3. Schedule:

- a. Ongoing
- b. Yearly review to take place in February or March

F5: Flood Management/Assessment Guidelines

1. Description of BMP:

The Village code includes "Division 3 – Floodplain Development Requirements" (Sections 46-83 to 46-98) which enforces flood hazard regulations for any development in or near floodplains. The WMO is also applicable and enforced with new developments. Development plans will be reviewed for compliance with applicable ordinances and policies with regard to flood management and for compliance with IDNR-OWR and FEMA regulations. Where applicable, developers will be required to submit for and obtain a Letter of Map Revision (LOMR) from FEMA.

2. Measurable Goals:

Reduced flooding and flood reduction

- a. Ongoing
- b. Development reviews as needed by Village staff and Village engineering consultant, Robinson Engineering.





G. Monitoring, Recordkeeping, and Reporting:

1. Monitoring:

Monitoring shall include at least annual monitoring of receiving waters upstream and downstream of the MS4 discharges, use of indicators to gauge the effects of stormwater discharges on the physical/habitat-related aspects of the receiving waters, and/or monitoring of the effectiveness of the BMPs.

2. Recordkeeping:

- a. The Village must keep records required by the ILR40 permit for the duration of the permit.
- All records shall be kept onsite or locally available and shall be made accessible to the Agency (IEPA) for review at the time of an on-site inspection.
- c. Except as otherwise required by the ILR40 permit, the Village must submit its records to the IEPA only when specifically asked to do so.
- d. As required by the ILR40 permit, the following (at a minimum) must be posted on the Village website:
 - i. Current Notice of intent (NOI)
 - ii. Storm Water Management Program/Plan (SWMP)
 - iii. Annual reports
- e. Storm sewer maps may be withheld for security reasons

3. Reporting:

- a. The Village must submit annual reports to the IEPA by the first day of June (**June 1**) for each year that the ILR40 permit is in effect.
- b. If the Village maintains a website, a copy of the annual report shall be posted on the website by June 1 of each year.
 - i. Along with annual reports, the following should be posted on the Village website:
 - Copy of the Village's Storm Water Management Plan (SWMP)
 - 2. Copy of the latest NOI
 - 3. Copy of the latest Annual Report
- c. Each report shall cover the period from March of the previous year through March of the current year. Please refer to the ILR40 permit for the list of items the annual report must include.





H. Revisions:

- 1. 10/12/07 Initial Plan
- 2. 7/27/15 Updated Plan for 2013–18
- 3. 4/15/16 Updated; added BMP C10
- 4. 5/2/18 Updated; added BMPs C3, C4, and C5
- 5.
- 6.

 $05\text{-}03\text{-}18_SWMP_LY18\text{-}21_FINAL.docx$



