Information on the Permittee:
Name of the Permittee: County of Jackson County, Missouri
Type of Entity: Unincorporated Jackson County
Total Area (acres): 573.3 acres
Mailing Address: 303 W. Walnut Street, Independence, MO 64050
Primary Contact: Tom Krahenbuhl
Phone Number: (816) 881-4530
Secondary Contact: _____
Phone Number: _____

MCM #1: Public Education and Outreach on Stormwater Impacts

4.2.1.1 Permit Requirements

Jackson County plans to continually implement new public education programs by distributing educational materials to the community and conducting outreach activities. The focus of these efforts will be to educate the public with activities discussing the impact of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff.

4.2.1.2 Decision Process

Jackson County develops their storm water public education and outreach program in cooperation with other jurisdictions in the region. The target pollutants are identified and prioritized. The actions that impact the target pollutants are identified. The public education program is designed to impact the actions identified.

The following is a prioritized list of the leading pollutants, experienced in the permitted area, that are carried by stormwater runoff into water bodies. (1 = having most impact and 10 = having least impact)

9 Suspended Solids
6 Nutrients
5 Pesticides
1 Metals
4 Bacteria
3 Oxygen-Depleting Substances (BOD & other organics)
7 Oil and Grease
10 Salinity (Salt)
2 Priority Toxic Organic Chemicals (Household Hazardous Waste Pesticide/Herbicides)
8 Habitat Alterations
_____ Floatables
_____ Temperature

4.2.1.2.1 Inform Public on Steps

Jackson County will continue to inform individuals and households in the community about the steps they can take to reduce stormwater pollution with the following programs:

	Year 1	Year 2	Year 3	Year 4	Year 5
Educational Materials:					
Post Information on Website	X	X	X	X	X
Display Posters on Public Transportation	X	X	X	X	X
Maintain a Library of Stormwater Educational Materials	X	X	X	X	X
Distribute Brochures:			X		
Lawn and Garden Activities	X				
Hazardous Waste Disposal				X	
Pet Waste Management	X				
Trash Management			X		
Vehicle Maintenance and Washing		X			
Illicit Discharges			X		
Distribute Brochures to Restaurant Owners	X	X	X	X	X
Distribute Brochures to Outdoor Sportsmen	X	X	X	X	X

*The topics for the brochures will be dependent on the topics in Mid-America Regional Council's (MARC) seasonal campaign for public educational. Additional topics will be included in the program, depending on the immediate needs of the surrounding communities. Detailed information about each seasonal campaign will be included in Jackson County's annual report.

	Year 1	Year 2	Year 3	Year 4	Year 5
Public Awareness:					
Issue Press Release Regarding Local Storm Water Issues	X	X	X	X	X
Publish Articles in Local Newspaper	X	X	X	X	X
Run Public Service Announcement on Local Radio Stations	X	X	X	X	X
Post poor quality of water at the site location	X	X	X	X	X

4.2.1.2.2 How to Become Involved

Jackson County will continue to inform individuals and groups on how to become involved in the stormwater program by providing those instructions in all materials distributed to the public. This is described in more detail in 4.2.2 Public Involvement/Participation.

4.2.1.2.3 Target Audiences

During the development of the education program, Jackson County identified the sources of stormwater pollutants that needed to be reduced to improve overall water quality. The target audiences were selected because changing their behavior would have a significant stormwater quality impact on the target pollutants. The target audiences for the public education program are:

1. Citizens (Homeowners)
2. Outdoor Sportsmen and Recreational Facility Users
3. Restaurant Owners and Operators

4.2.1.2.4 Target Pollutant Sources

The target pollutant sources having a major impact on stormwater quality were identified. The following is a list of these sources:

The following is a list of potential sources of pollutants that are experienced in the permitted area. (1 = Major impact, 2 = Minor impact, 3 = Not an impact)

2	Construction activities (sediment, construction chemicals and debris, solid and sanitary wastes)
2	Overapplication of fertilizer, herbicides, pesticides
3	Improper disposal of paint and household hazardous chemicals
3	Pet waste contamination
2	Improper disposal of waste oil, grease, and gasoline disposal
3	Trash, debris, and illegal dumping
3	Detergents washed into drains
2	Snow removal (salt, sand and snow disposal)
3	Sanitary sewer overflows
2	Infiltration from cracked sanitary sewers
3	Failing septic systems
3	Sewer service connections to storm drainage system
3	Foundation drains connected to storm drainage system
3	Downspouts connected to storm drainage system
3	Lake or water body used for motor boating
3	Spills from roadway accidents or fires
3	Connected impervious areas covering large acreages (such as malls, institutions with large parking areas)
2	Stream bank erosion
3	Waste transfer station

4.2.1.2.5 Outreach Strategy & Partnerships

Jackson County's outreach strategy is to continue implementing a variety of methods to reach a number of different target audiences multiple times. To change behavior, repetition is important. The mechanisms are described in 4.2.1.2.1 of this permit application.

The strategy is to continue partnering with other governmental and non-governmental entities to execute the public outreach strategy. The idea is to share information and resources so duplication does not occur. The following entities will be assisting with the effort:

1. Other Communities in the Region
2. Watershed Associations
3. Regional Planning Organization (MARC)

The number of people targeted to be reached by the public education and outreach strategy is approximately 4,000 per year.

4.2.1.2.6 Person Responsible

The person responsible for overall management and implementation of the permittee's stormwater public education and outreach program is the **Stormwater Administrator**. Others may be involved in the execution of each of the individual activities in the programs.

4.2.1.2.7 Measurable Goals Selection

Jackson County selected the measurable goals for each of the BMPs after reviewing EPA & ASCE research on the effectiveness of certain BMPs. The BMPs selected were chosen because of the evidence that they will have a positive impact the target pollutants identified as a concern for Jackson County. The public education and outreach BMPs were also selected because many have been effective methods of communicating with the public for our community. The implementation of BMPs selected will determine the success of the measure on water quality.

MCM #2: Public Involvement and Participation

4.2.2.1 Permit Requirements

Jackson County will comply with State and Local public notice requirements when implementing the public involvement and participation program.

4.2.2.2 Decision Process

The following is the documentation for Jackson County's decision process and rationale statement for the development of a stormwater public involvement and participation program. It documents the overall program and the individual BMPs, measurable goals, and responsible party for the program.

4.2.2.2.1 Involving the Public in Developing the Submittal

Jackson County has and will continue to involve the public in the development and submittal of the application and stormwater management program as follows:

1. Held Stakeholder Meetings
2. Held a Public Meetings
3. Posted Public Meeting Announcements

4.2.2.2.2 Involving the Public in Program Implementation

Jackson County plans to actively involve the public in the development and implementation of the stormwater program through a number of different methods selected because they are existing effective methods used by Jackson County or because of EPA guidance documents that list these BMPs as effective public involvement methods.

4.2.2.2.3 Target Audiences to Involve in Program

The target audiences for the permittee's public involvement program are:

1. Citizens (Homeowners)
2. Mass Media
3. Watershed Organizations
4. Restaurant Owners

4.2.2.2.4 Public Involvement Activities

Jackson County plans will involve the public through the activities described below, in conjunction with MARC and others:

	Year 1	Year 2	Year 3	Year 4	Year 5
Conduct Attitude Survey	X				X
Establish Community Hotline	X	X	X	X	X
Hold Public Meetings	X	X	X	X	X
Hold Watershed Monitoring and Cleanup Activities	X	X	X	X	X

4.2.2.2.5 Person Responsible

The person responsible for the overall management and implementation of the permittee's stormwater public involvement/participation program is the **Stormwater Administrator**. Others will be involved in the execution of each of the individual activities in the programs.

4.2.2.2.6 Goal Selected

Jackson County selected the measurable goals for each of the BMPs after reviewing EPA & ASCE research on the effectiveness of certain BMPs. The BMPs selected were chosen because of the evidence that they will have a positive impact the target pollutants identified as a concern for Jackson County. Some of the public involvement methods selected were also chosen because they have been used effectively by Jackson County in the past. The implementation of BMPs selected will determine the success of the measure on water quality.

MCM #3: Illicit Discharge Detection and Elimination

4.2.3.1 Permit Requirement.

4.2.3.1.1 Overview

Jackson County will continue developing and enforcing its program to detect and eliminate illicit discharges (as defined in 10 CSR 20-6.200) into their small MS4.

4.2.3.1.2 Map

Jackson County will review and update its storm sewer system map, showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls.

The map will be developed using:

	Year 1	Year 2	Year 3	Year 4	Year 5
Aerial Photography			X		

4.2.3.1.3 Enforcement

Jackson County will effectively prohibit non-stormwater discharges into the stormwater system of Jackson County's stormwater system via the following ordinances and regulations. Each ordinance/regulation is enforceable by Jackson County with appropriate procedures and consequential actions.

4.2.3.1.4 Methods to Detect

Jackson County will implement a plan using the following methods to detect and address non-stormwater discharges, including illegal dumping to the stormwater system:

	Year 1	Year 2	Year 3	Year 4	Year 5
Visual Inspection	X	X	X	X	X
Public Watch Programs	X	X	X	X	X

4.2.3.1.5 Informing the Public

Jackson County will inform public employees, businesses and the general public of hazards associated with illegal discharges and improper disposal of waste using the following methods:

	Year 1	Year 2	Year 3	Year 4	Year 5
Educational Programs:					
Procedural Training for County Staff	X	X	X	X	X
Distribute Literature	X	X	X	X	X
Recycling Program	X	X	X	X	X

	Year 1	Year 2	Year 3	Year 4	Year 5
Volunteer Programs:					
Household Hazardous Waste Collection	X	X	X	X	X
Illegal Dumping Hotline	X	X	X	X	X

4.2.3.1.6 Not Significant Contributors

Jackson County has not identified any of the following categories of non-stormwater discharges or flows (i.e. illicit discharges) as significant contributors of pollutants to their small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined in 10 CSR 20-6.200), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, springs, water from crawl space pumps, footing drains, lawn watering, flows from riparian habitats and wetlands, and street wash water (discharges or flows from fire fighting activities are excluded from the effective prohibition against non-stormwater and will only be addressed where they are identified as significant sources of pollutants to waters of the State.)

4.2.3.1.7 Occasional Incidental Non-Stormwater Discharges

Jackson County's illicit discharge ordinance does not include a list of other similar occasional incidental non-stormwater discharges (e.g. non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges because they are not reasonably significant sources of pollutants to the MS4. Should these occasional or incidental non-stormwater discharges be identified in the future, those entities responsible for discharging will be prohibited or conditions placed on them so as to minimize their discharge of pollutants.

4.2.3.2 Decision Process

Jackson County has documented their decision process for the development of a stormwater illicit discharge detection and elimination program. Jackson County's rationale statement addresses both their overall illicit discharge detection and elimination program and the individual BMPs, measurable goals, and responsible persons for their program.

4.2.3.2.1 Sources for Mapping

Jackson County has develop a storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Jackson County used the following sources to compile the maps:

1. Aerial Photography

As development occurs, Jackson County will use proposed building plans to locate new outfalls and update the maps.

4.2.3.2.2 Regulatory Mechanism

Jackson County will use the following mechanism to effectively prohibit illicit discharges to the MS4:

1. Inspections upon complaint

This mechanism was selected because ordinances are commonly used by Jackson County to establish laws and set forth the enforcement mechanisms. The ordinance establishes legal authority: to regulate the contribution of pollutants to the municipal separate storm sewer system (MS4) of stormwater discharges by any use; to prohibit illicit connections and discharges to the MS4; and to establish legal authority to carry out all inspections, surveillance and monitoring procedures necessary to ensure compliance.

Jackson County will follow mechanisms to effectively prohibit illicit discharges to the MS4 on the respective schedule:

	Year 1	Year 2	Year 3	Year 4	Year 5
Inspections Upon Complaint	X	X	X	X	X

4.2.3.2.3 Enforcement

Jackson County will set forth in the ordinance enforcement procedures intended to remove the source of the illicit discharge detected.

Jackson County will ensure implementation of the mechanisms described in 4.2.3.2.2 above with the following enforcement actions:

	Year 1	Year 2	Year 3	Year 4	Year 5
Civil Penalties	X	X	X	X	X

4.2.3.2.4 Detection

Jackson County will detect and address illicit discharges to the MS4, including discharges from illegal dumping and spills. Jackson County's program will address on-site sewage disposal systems that flow into the MS4.

4.2.3.2.4.1 Identify Priority Areas

Jackson County will continually use the system maps identified in 4.2.3.1.2 above and other data to identify priority areas with likelihood of illicit connections.

4.2.3.2.4.2 Trace the Source

N/A

4.2.3.2.4.3 Removal

Jackson County will follow the ordinance adopted and the enforcement mechanisms detailed in the ordinance including those legal actions described in 4.2.3.1.3 above to enforce the removal of an identified illicit connection.

4.2.3.2.4.4 Program Evaluation

The success of the described program will be evaluated annually by analyzing the number of complaints which lead to illicit connections discovered and eliminated.

4.2.3.2.5 Public Information

Jackson County will inform public employees, business and the general public of hazards associated with illegal discharges and improper disposal of waste through the following methods:

	Year 1	Year 2	Year 3	Year 4	Year 5
Educational Programs:					
Procedural Training for County Staff	X	X	X	X	X
Distribute Literature	X	X	X	X	X
Recycling Program	X	X	X	X	X

	Year 1	Year 2	Year 3	Year 4	Year 5
Volunteer Programs:					
Household Hazardous Waste Collection	X	X	X	X	X
Illegal Dumping Hotline	X	X	X	X	X

Where applicable the information distributed through these means will coordinate with the information distributed in the Public Education minimum control measure (e.g., consistent/coordinated messages in literature).

4.2.3.2.6 Responsible Party

The **Stormwater Administrator** will be responsible for overall management and implementation of Jackson County's stormwater illicit discharge detection and elimination program. Others will be involved in the execution of each of the individual activities in the programs.

4.2.3.2.7 Measurable Goals

Jackson County will evaluate the success of its programs, based on:

The number of complaints leading to illicit connections found and eliminated.

Jackson County selected the measurable goals for each of the BMPs after reviewing EPA & ASCE research on the effectiveness of certain BMPs. The BMPs selected were chosen because of the evidence that they will have a positive impact the target pollutants identified as a concern for Jackson County. Some of the methods to detect and eliminate illicit discharges were also chosen because they have been used effectively by Jackson County in the past. The implementation of BMPs selected will determine the success of the measure on water quality.

MCM #4: Construction Site Stormwater Runoff Control

4.2.4.1 Permit Requirements

Jackson County has developed, implemented, and is enforcing a program to reduce pollutants in any stormwater runoff from construction activities that result in disturbance of greater than or equal to one acre.

4.2.4.1.1 Regulatory Mechanism

Jackson County has an ordinance mechanism with the required erosion and sediment controls, as well as sanctions to ensure compliance.

4.2.4.1.2 Best Management Practices (BMPs)

Jackson County requires construction site operators to implement the appropriate erosion and sediment control Best Management Practices (BMPs).

4.2.4.1.3 Wastes to Be Controlled

Jackson County requires construction site operators to control wastes that may cause adverse impacts to water quality such as:

1. Sediment

4.2.4.1.4 Site Plan Review

Jackson County has procedures in their ordinance for site plan review, which will incorporate consideration of potential water quality impacts.

4.2.4.1.5 Receipt & Consideration of Public Comment

Jackson County received public in put in the development of the current ordinance which address erosion control.

4.2.4.1.6 Site Inspection

Jackson County has procedures in their ordinance for site inspection and enforcement of erosion and sediment control measures.

4.2.4.2 Decision process

The following is the rationale statement for the development of Jackson County's overall construction site stormwater runoff control program. It documents the individual BMPs, measurable goals, and responsible party for their program.

4.2.4.2.1 Regulatory Mechanism

Jackson County has an ordinance that requires the use of erosion and sediment controls on construction sites.

Other mechanisms currently available to anyone involved in design and construction of erosion and sediment control activities. Those mechanisms include but are not limited to:

	Year 1	Year 2	Year 3	Year 4	Year 5
Design Methodologies	X	X	X	X	X
Construction Specifications	X	X	X	X	X
Standard Details	X	X	X	X	X

4.2.4.2.2 Enforcement

Jackson County will ensure compliance with the following sanctions:

1. Non-Monetary Penalties (such as Stop Work Orders)
2. Injunction
3. Fine upon conviction of code violation

4.2.4.2.3 Implementation of Proper Controls

Jackson County requires construction site operators to control wastes that may have adverse impacts on water quality including:

	Year 1	Year 2	Year 3	Year 4	Year 5
Implementation of Proper Erosion and Sediment Controls per development ordinance	X	X	X	X	X

4.2.4.2.4 Pre-Construction Site Plan Review

Jackson County has procedures for site plan review, including the review of pre-construction plans, which will look at the potential water quality impacts. The estimated percentage of sites that will have a pre-construction site plan review is 100%.

	Year 1	Year 2	Year 3	Year 4	Year 5
Review of Construction Plans	X	X	X	X	X

4.2.4.2.5 Public Input on Submittals

Jackson County provides for receipt and consideration of information submitted by the public, planning commission, public hearing and land use committee public hearings required for land development.

4.2.4.2.6 Site Inspection & Enforcement

Jackson County has procedures for site inspection and enforcement of control measures.

	Year 1	Year 2	Year 3	Year 4	Year 5
Site Inspection and Enforcement	X	X	X	X	X

4.2.4.2.7 Person Responsible

The person responsible for overall management and implementation of the permittee's stormwater public education and outreach program is the **Stormwater Administrator** . Others will be involved in the execution of each of the individual activities in the programs.

4.2.4.2.8 Measurable Goals

Jackson County selected the measurable goals for each of the BMPs after reviewing EPA & ASCE research on the effectiveness of certain BMPs. The BMPs selected were chosen because of the evidence that they will have a positive impact on the target pollutants identified for Jackson County. The implementation of BMPs selected will determine the success of the measure on water quality.

MCM #5: Post-Construction Stormwater Management in New Development and Redevelopment

4.2.5.1 Permit Requirement

4.2.5.1.1 Overview

Jackson County has developed, implemented, and is enforcing a program to address stormwater runoff from new development and redevelopment projects.

4.2.5.1.2 Strategies

Jackson County has developed and implemented strategies, which will include a combination of structural and/or non-structural Best Management Practices (BMPs), appropriate for the community.

4.2.5.1.3 Ordinance

Jackson County uses an ordinance and other regulatory mechanisms to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or Local law.

4.2.5.1.4 Long-Term Operation & Maintenance

Jackson County will ensure adequate long-term operation and maintenance of BMPs.

4.2.5.2 Decision Process

The following is the rationale statement for the development of a post-construction stormwater management program. It documents the BMPs, measurable goals, and responsible party for the program.

4.2.5.2.1 Priority Areas

Jackson County has implemented regulatory procedures to address stormwater runoff from new development and redevelopment projects. There are no areas identified as a priority for regulatory procedures.

4.2.5.2.2 Regulatory Procedures

Jackson County has implemented regulatory procedures that are specifically tailored for the community to minimize water quality impacts, and attempt to maintain or improve pre-development runoff conditions.

	Year 1	Year 2	Year 3	Year 4	Year 5
Ordinance	X	X	X	X	X
Publication of BMPs	X	X	X	X	X

4.2.5.2.3 Non-Structural Best Management Practices (BMPs)

4.2.5.2.3.1 Policies & Ordinances

Jackson County has implemented policies and ordinances, as needed, to help minimize water quality impacts.

4.2.5.2.3.2 Infill Development

N/A

4.2.5.2.3.3 Education

Jackson County has and will continue to implement education programs for developers and the public about project designs that minimize water quality impacts.

4.2.5.2.3.4 Other Non-Structural Measures

N/A

4.2.5.2.4 Structural BMPs

4.2.5.2.4.1 Structural BMPs

Jackson County will implement the following structural BMPs:

	Year 1	Year 2	Year 3	Year 4	Year 5
Detention/Retention	X	X	X	X	X

4.2.5.2.5 Regulatory Mechanism

Jackson County has an ordinance or other regulatory mechanisms to address post-construction runoff from new developments and redevelopment's. These mechanisms will help to not only recommend proper practices, but will help enforce the proper use of the practices under certain circumstances. They include:

	Year 1	Year 2	Year 3	Year 4	Year 5
Ordinance	X	X	X	X	X
Publication of BMPs	X	X	X	X	X

Jackson County will ensure compliance with the developed ordinance's by way of sanctions and enforcement mechanisms. Jackson County will implement the following sanctions in their ordinance:

1. Non-Monetary Penalties (such as Stop Work Orders)
2. Fines
3. Ordinance

4.2.5.2.6 Long-Term Operation & Maintenance

As new development occurs, Jackson County will implement options to help ensure the long-term operation and maintenance of their selected BMPs. These options will help ensure that future O&M responsibilities are clearly identified.

4.2.5.2.7 Responsible Party

The person responsible for overall management and implementation of the permittee's stormwater public education and outreach program is the **Stormwater Administrator**. Others will be involved in the execution of each of the individual activities in the programs.

4.2.5.2.8 Measurable Goals

Jackson County selected the measurable goals for each of the BMPs after reviewing EPA & ASCE research on the effectiveness of certain BMPs. The BMPS selected were chosen because of the evidence that they will have a positive impact on the target pollutants identified as a concern for Jackson County. The implementation of BMPs selected will determine the success of the measure on water quality.

MCM #6: Pollution Prevention/Good Housekeeping for Municipal Operations

4.2.6.1 Permit Requirement.

4.2.6.1.1 Overview

Jackson County has developed and implemented an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. This practice shall be reviewed and updated as needed.

4.2.6.1.2 Training

Using training materials that are available from EPA, State and other organizations, Jackson County's program will include employee training to prevent and reduce stormwater pollution from activities.

4.2.6.2 Decision Process

Jackson County has documented their decision process for the development of a pollution prevention/good housekeeping program for municipal operations. Jackson County's rational statement addresses both their overall pollution prevention/good housekeeping program and the individual BMP's, measurable goals, and responsible persons for the program. The rational statement is as follows:

4.2.6.2.1 Pollution Prevention & Good Housekeeping Measures

Jackson County will implement pollution prevention and good housekeeping measures in the following County activities:

	Year 1	Year 2	Year 3	Year 4	Year 5
Recycling Program	X	X	X	X	X
Maintenance Schedule	X	X	X	X	X
Maintenance Activities	X	X	X	X	X
Employee Training	X	X	X	X	X

4.2.6.2.2 Employee Training

Jackson County will formalize and implement an employee-training program in the following areas so as to prevent and reduce stormwater pollution from the following activities:

	Year 1	Year 2	Year 3	Year 4	Year 5
Park and Open Space Maintenance	X	X	X	X	X
Fleet and Building Maintenance	X	X	X	X	X
Snow Removal Operations	X	X	X	X	X

These activities will be coordinated with the outreach programs developed for the public information and illicit discharge minimum control measures so that a consistent message is presented throughout Jackson County's program.

4.2.6.2.3 Activities

Jackson County's program will address the following areas:

4.2.6.2.3.1 Clean Up Activities

The following activities will be formalized and implemented to reduce the floatables and other pollutants in the MS4:

	Year 1	Year 2	Year 3	Year 4	Year 5
Maintenance Schedule	X	X	X	X	X
Maintenance Activities	X	X	X	X	X

4.2.6.2.3.2 Pollutant Locations

Jackson County would like to reduce or eliminate the discharged pollutants from the following locations:

1. Fleet or Maintenance Shops with Outdoor Storage Areas

The following controls and/or programs will be implemented to reduce or eliminate the discharge of pollutants from facilities owned by Jackson County:

	Year 1	Year 2	Year 3	Year 4	Year 5
Recycling Program	X	X	X	X	X
Employee Training	X	X	X	X	X

4.2.6.2.3.3 Pollutant Removal

Jackson County will implement training procedures for the removal of dredge spoil, accumulated sediments, floatables, and other debris.

4.2.6.2.3.4 Flood Management

Jackson County will review their current road maintenance activities concerning flood management to ensure they allow for:

1. Assessment and implementation of solutions that address impacts to water quality for new projects and;
2. Review of existing projects for inclusion of water quality aspects.

4.2.6.2.4 Responsible Party

The **Stormwater Administrator** will be responsible for overall management and implementation of the pollution prevention and good housekeeping program for Jackson County. Others will be involved in the execution of each of the individual activities in the programs.

4.2.3.2.5 Program Evaluation

Jackson County will evaluate the success of the pollution prevention/good housekeeping minimum control measure by tracking the progress of each measure against the implementation schedule. Each one of the measures described in this permit was chosen based on its implementability by Jackson County staff and impact on water quality.