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SWMP for
NPDES
Municipal
Separate Storm
Sewer
System (MS4)
Compliance

Report

Lemont Township, IL

April 2019



Report for Lemont Township, Illinois

Stormwater Management Program (SWMP) for
National Pollutant Discharge Elimination System
(NPDES) Municipal Separate Storm Sewer System
(MS4) Compliance



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April 2019



TABLE OF CONTENTS

Page No.
or Following

SWMP FOR NPDES MS4 COMPLIANCE

Introduction	1
Public Education and Outreach.....	1
Public Involvement and Participation.....	2
Illicit Discharge Detection and Elimination.....	3
Construction Site Stormwater Runoff Control.....	5
Post-Construction Runoff Control.....	6
Pollution Prevention and Good Housekeeping	7

APPENDICES

APPENDIX A– ILLICIT DISCHARGE INCIDENT TRACKING FORM
APPENDIX B–OUTFALL INSPECTION FORM
APPENDIX C–BMP MAINTENANCE FOLLOW-UP FORM

ATTACHMENT

STORMWATER MANAGEMENT PROGRAM–MILESTONE SUMMARY

INTRODUCTION

Lemont Township, Illinois, (Township) is subject to the requirements of the Illinois Environmental Protection Agency's (IEPA) National Pollutant Discharge Elimination System (NPDES) Permit ILR-40 for Municipal Separate Storm Sewer Systems (MS4). This Stormwater Management Program (SWMP) presents the strategies and goals to be implemented by the Township for compliance with NPDES Permit ILR-40.

Each section of this report presents the minimum controls required to be included in the Township's SWMP. Each section also details the Best Management Practices (BMP) the Township will employ to satisfy the respective minimum control, the measurable goals to monitor achievement of each practice, and a schedule or frequency for implementation of each practice.

PUBLIC EDUCATION AND OUTREACH

The Township is required to implement a public education and outreach program through distribution of educational materials to the public to increase public understanding and awareness of the impact on stormwater discharges on water bodies. The key to a successful SWMP is an educated and active community that helps to prevent pollution at its source. A large majority of residents nowadays rely on retrieving information through the internet, and thus the Township focuses its efforts on public education through that medium.

A. Public Service Announcement

BMP: The Township will establish a Web page on its Web site to post everything concerning stormwater-related issues. Any public service announcements will be posted on the created Web page.

B. Community Event

1. BMP: The Township promotes an Annual Cleanup each spring and fall. Residents can dispose of unwanted and potentially harmful household hazardous materials to various locations in the Township.
2. BMP: The Township will work with private businesses and other stakeholders to promote an annual creek cleanup to engage local school and community groups.
3. Measurable Goal: Help promote at least two days' worth of programs per year that work toward reducing the potential for stormwater pollution and involve the greater community.
4. Schedule: Update the Web site with information pertaining to above events before April of each permit year.

C. Other Public Education–Web site

1. BMP: The Township will create a Web page providing information on stormwater management, including the SWMP, Annual Reports, and tools for residents. These tools will help residents of Lemont Township become aware of and involved in the process of

- preventing pollution in their waterways (e.g., dewatering pools, disposing of vehicle fluids, carwash waste).
2. Measurable Goal: By the end of the third permit year, a stormwater Web page will be created. In following years, traffic to that Web page will be tracked and information on the page will be updated.
 3. Schedule: Create a stormwater Web page by September of 2019.

D. Climate Change Issues

BMP: The Township will include links to NASA climate change information on the newly created stormwater-related Web page. Occasionally, the articles published in the Township Newsletter will feature information on how climate change and stormwater are interrelated.

PUBLIC INVOLVEMENT AND PARTICIPATION

This control is focused on continuing and increasing the participation of citizens to protect and care for their waters. This section describes the various Township programs that offer its residents and business owners opportunities to get involved in stormwater pollution prevention administration and activities.

A. Public Hearing

BMP: Lemont Township will provide an annual presentation about the importance of water quality and stormwater pollution prevention, as well as the SWMP, at a Township Board meeting. Following the meeting, the Township will then upload a record of the presentation and questions and answers on the Township's stormwater Web page.

B. Environmental Justice Assessment

BMP: The Township will work with adjacent communities to perform an environmental justice assessment (EJA). The goal of the EJA will be to determine whether there are any specific geographic areas within the Township that might warrant nuances to the SWMP (e.g., providing stormwater information to non-English speaking households). Furthermore, the EJA will help the Township better target underprivileged stakeholders to participate in planning and shaping future SWMPs and potential BMP placement.

C. Volunteer Monitoring

1. BMP: The Township will create an interactive section on the new Web page to allow the public to report stormwater and pollution violations and stormwater-related comments. Volunteer monitors can greatly help limited Township staff in observing development projects.
2. Measurable Goal: Track the number of reports that citizen volunteers provide on the Web site and the amount of time before the issue is resolved.

ILLICIT DISCHARGE DETECTION AND ELIMINATION

This section presents the Township's efforts to find and remove illicit discharges into the stormwater system and open waterways. Using geographic information system tools and various field-testing techniques performed by trained personnel and certified laboratory testing, the Township's Illicit Discharge Detection and Elimination (IDDE) Plan is intended to ensure that pollution contributors are identified and removed as quickly and with as little damage as possible.

A. Storm Sewer Map Preparation

1. **BMP:** The Township will create a comprehensive map of its storm sewer system and will include creeks and waterways receiving discharges from MS4 outfalls.
2. **Measurable Goal:** By 2021, the Township will create the comprehensive storm sewer map.
3. **Schedule:** Going forward, the Township will continue updating the storm system mapping with new storm sewer and surface water information.

B. Regulatory Control Program

BMP: The Township falls under the jurisdiction of Cook County (County) and the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) and its Watershed Management Ordinance (WMO). The WMO, along with the various NPDES permits under MWRDGC's responsibility, expressly prohibit illicit discharges into the public sewer system. Through the WMO, the Township has authority to enforce its IDDE within its right-of-way (ROW). Furthermore, the Township will report to the County and MWRDGC any illicit discharges that Township staff discover or are alerted to that lie in developments outside the Township's jurisdiction.

C. Detection and Elimination Prioritization Plan

1. **BMP:** The Township will create a comprehensive IDDE Plan. Staff will update the IDDE Plan on an annual basis incorporating new information from the last update. Of primary importance will be updating priority outfalls within the Township's jurisdiction.
2. **Measurable Goal:** The Township will revise and update priority outfalls on an annual basis.

D. Illicit Discharge Tracing Procedures

1. **BMP:** The Township's IDDE Plan will provide procedures for identifying and tracing illicit discharges. As part of these procedures, the Township will observe its drainage system to investigate illicit discharges.
2. **Measurable Goal:** Record annual implementation of the IDDE Plan and the results of tracing illicit discharges. Record details of the process employed and results.
3. **Schedule:** Implement the IDDE tracing procedures as determined to be necessary. Compile an annual report in December of each year.

E. Illicit Source Removal Procedures

1. BMP: Upon discovery of an illicit discharge, the Township will proceed with remediation and enforcement of removal procedures through its IDDE Plan. Township staff will deliver a letter to the entity responsible for the illicit discharge, stating the discharge must be removed within a reasonable amount of time and cleanup efforts undertaken. Continued ignorance of the illicit discharge on part of the responsible entity will result in further actions being taken. An illicit discharge incident tracking form is included in the Appendix of this SWMP.
2. Measurable Goal: Maintain an annual record of implementation of the IDDE Plan, results of findings, remediation and removal action taken, and enforcement performed through elimination of the discharge

F. Visual Dry Weather Screening

1. BMP: The City will implement a Visual Dry Weather Screening program as part of its IDDE Plan. Staff will perform visual dry weather inspections of outfalls in summer months during dry weather. This screening program will be reviewed and updated annually. An outfall inspection form is included in the Appendix of this SWMP.
2. Measurable Goal: Record annual implementation of the dry weather screening process as part of the IDDE Plan and results of tracing illicit discharges. Record details of each process and results and include in annual report.
3. Schedule: Perform visual dry weather inspections of plan-identified outfalls annually in the summer months during dry weather conditions.

G. Public Notification

1. BMP: To encourage community awareness and involvement, the Township Web site will include a section for residents to report violations. The webmaster will then direct the concerns to the appropriate entity.
2. BMP: To encourage community awareness and involvement, the IDDE Plan will be posted on the stormwater Web site along with a copy of the annual report.
3. Measurable Goal: Post the annual IDDE Plan report on the stormwater Web site.
4. Schedule: Post the annual IDDE Plan report in March for the previous year.

H. Program Evaluation and Assessment

BMP: The Township will evaluate the effectiveness of its IDDE Plan each year and decide on ways to improve it. The Township will track metrics mentioned above, including the number of outfalls inspected, number of illicit discharges reported and eliminated, and number of public notifications.

CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Cook County Department of Planning and Development, not the Township, reviews all plans to make sure they comply with release rates and erosion protection measures outlined in the WMO. Ordinance language requires installation of erosion control measures including filter fabric in structures, straw bales around structures, erosion control barrier around sites, stabilized construction entrances, and any other measures. The County also performs regular inspections on all open sites to ensure that erosion control measures are adequate, and the project is built to the required specifications. The Township acts as an additional observer over projects within its boundaries.

A. Regulatory Control Program

1. BMP: Township development reviews fall under the jurisdiction of Cook County Department of Planning and Development and MWRDGC. Thus, language regulating construction site stormwater runoff control from these two entities dictates how construction sites proceed within the Township. Currently, all projects are required to apply for a building permit from Cook County and to submit a Notice of Intent (NOI) to the IEPA for a discharge permit under ILR-10.
2. BMP: The Township will perform periodic observations of development sites to ensure compliance with its MS4 permit. If a site is not in compliance, the Township will notify both the contractor and the County/MWRDGC of the infraction.

B. Erosion and Sediment Control BMPs

1. BMP: The Township will require implementation of erosion control measures in its permits to install driveways and culverts within Township ROW, for which it holds jurisdiction as opposed to the County.
2. Measurable Goal: Track the status of all construction activity within the Township's jurisdiction by the end of the third year.

C. Site Plan Review Procedures

BMP: The Township reviews any plans to amend driveways/roadside drainage (i.e., culverts) within its ROW, and the County reviews all other site plans. However, the Township acknowledges proposed permits from the County concerning such driveways/culverts, and thus the Township plays a role in ensuring proper stormwater BMPs are in place for those projects as well. The Township will work with the County to enforce the provisions of this permit and ensure BMPs are in place during and after construction.

D. Public Information Handling Procedures

1. BMP: The Township will develop a process for resident reporting of stormwater violations through the Web site or by telephone.
2. Measurable Goal: Track the number and status of concerns posted through the Web site. Annually evaluate the status of all posts and track trending of posts to assess the usage and efficacy of the Web site.

3. Schedule: Establish the stormwater Web site by the end of 2019. Perform a review of NOI status in January of each year and update the postings and tracking record as necessary. Review trends of Web site use and resolutions of concerns.

E. Site Inspection/Enforcement Procedures

1. BMP: Township development reviews fall under the jurisdiction of Cook County Department of Planning and Development, who then carries out site inspections. However, the Township will perform periodic observations of development sites to ensure compliance with its MS4 permit. If a site is not in compliance, the Township will notify both the contractor and the County/MWRDGC of the infraction.

POST-CONSTRUCTION RUNOFF CONTROL

Following completion of construction and issuance of and Notice of Termination to the IEPA, new sites can still have great effects on local waters if not properly maintained. BMPs implemented throughout the site are designed to provide pollutant capture, erosion control, and runoff reduction and are implemented by the Township to reduce stormwater pollution.

A. Community and Private Property Control Strategy

BMP: The Township will work to education private property owners on ways to reduce stormwater runoff pollution from their properties. Education materials will be posted on the Township Web site and distributed at community events.

B. Regulatory Control Program

1. BMP: The Township will update any driveway/roadway drainage permits it distributes to require the establishment of permanent erosion control prior to the release of bond for construction projects under its jurisdiction.
2. Measurable Goal: Track the status of all new Township improvement projects and Township improvement projects and enforce compliance with erosion and sediment controls.
3. Schedule: Inventory BMP designs implemented through new development or improvement projects in January of every year.

C. Site Inspections during Construction

BMP: The Township will develop a plan to inspect sites during construction and verify erosion and sediment controls for driveway projects under its jurisdiction. All other projects fall under the jurisdiction of the County.

D. Post-Construction Inspection

1. BMP: The Township will continue inspecting sites following construction and verify erosion and establishment of sediment controls for driveway projects under its jurisdiction.

2. BMP: The Township will observe whether erosion controls are established at all other projects falling under the jurisdiction of the County. If proper BMPs are not implemented, staff will alert the responsible parties as to the issue for its proper resolution.

E. Long-Term Operation and Maintenance (O&M) Procedures

1. BMP: The Township will ensure proper establishment of erosion controls for all improvement projects within its ROW for two years after project completion. A BMP maintenance follow-up form is included in the Appendix of this SWMP.
2. BMP: Following completion of all other County-delegated development projects, the Township will observe BMPs and ensure the proper O&M steps have been taken.

F. Floodplain Climate Change Impact Assessment

The Township does not currently have a procedure regarding floodplain climate change impacts.

POLLUTION PREVENTION AND GOOD HOUSEKEEPING

The Township plays an active role in preventing its own streets, lands, and storm sewers from degrading water quality. The Township's BMPs for good housekeeping revolve around keeping operations in the Township running cleanly, smoothly, and in a way that will be sustainable for the long term.

A. Annual Employee Training Program

1. BMP: The Township sends staff to monthly meetings that at least annually feature training sessions on incorporating pollution prevention and good housekeeping techniques into municipal operations.
2. Measurable Goal: Track employee reported stormwater runoff and water quality issues following attendance at such training sessions.
3. Schedule: Send at least one employee to monthly meetings that annually feature stormwater-related issues.
4. Schedule: Review the employee-reported issues and track trending of employee awareness of stormwater issues in January of every year.

B. Inspection and Maintenance Program

1. BMP: The Township visually monitors detention ponds and provides reports to the County concerning the condition and repair schedules of each of the ponds.
2. Measurable Goals: Visually monitor detention ponds on an annual basis. Maintain a spreadsheet of monitoring and repair schedules for the Township's detention ponds. Analyze how often action is taken.

C. Municipal Operations Stormwater Control

1. BMP: The Township retains a vehicle fleet and always performs car washes at indoor facilities. This practice prevents the pollution of waterways through heavy metals, surfactants, and oils.
2. BMP: The Township promotes an event with local businesses allowing residents to drop off batteries/electronics/hazardous waste. Through such a co-sponsorship, the Township helps prevent these materials from potentially entering local waterbodies and traveling downstream.

D. Chemical Storage–Pollution Prevention

BMP: The Township maintains domed storage of its deicing materials during the winter months. This practice ensures that unnecessary pollution of local waterways does not take place when Township staff move the rock salt from its storage area onto trucks to be used on local roadways.

**APPENDIX A
ILLICIT DISCHARGE INCIDENT TRACKING FORM**

Illicit Discharge Incident Tracking Sheet

Incident ID:

Responder Information

Call taken by:

Call time: **Precipitation (inches) in past 24-48 hrs:**

Reporter Information

Incident time: Incident date:

Caller contact information (optional):

Incident Location *(complete one or more below)*

Latitude and longitude:

Stream address or outfall #:

Closest street address:

Nearby landmark:

Primary Location Description **Secondary Location Description:**

<input type="checkbox"/> Stream corridor <i>(In or adjacent to stream)</i>	<input type="checkbox"/> Outfall	<input type="checkbox"/> In-stream flow	<input type="checkbox"/> Along banks
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<input type="checkbox"/> Upland area <i>(Land not adjacent to stream)</i>	<input type="checkbox"/> Near storm drain	<input type="checkbox"/> Near other water source (storm water pond, wetland, etc.):
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Narrative description of location:

Upland Problem Indicator Description

<input type="checkbox"/> Dumping	<input type="checkbox"/> Oil/solvents/chemicals	<input type="checkbox"/> Sewage
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<input type="checkbox"/> Wash water, suds, etc.	<input type="checkbox"/> Other: _____
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Stream Corridor Problem Indicator Description

Odor	<input type="checkbox"/> None	<input type="checkbox"/> Sewage	<input type="checkbox"/> Rancid/Sour	<input type="checkbox"/> Petroleum
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	<input type="checkbox"/> Sulfide (rotten eggs); natural gas	<input type="checkbox"/> Other: Describe in "Narrative" section		
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Appearance	<input type="checkbox"/> "Normal"	<input type="checkbox"/> Oil sheen	<input type="checkbox"/> Cloudy	<input type="checkbox"/> Suds
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	<input type="checkbox"/> Other: Describe in "Narrative" section			
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Floatables	<input type="checkbox"/> None:	<input type="checkbox"/> Sewage (toilet paper, etc)	<input type="checkbox"/> Algae	<input type="checkbox"/> Dead fish
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	<input type="checkbox"/> Other: Describe in "Narrative" section			
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Narrative description of problem indicators:

Suspected Violator (name, personal or vehicle description, license plate #, etc.):

Investigation Notes

Initial investigation date:

Investigators:

No investigation made

Reason:

Referred to different department/agency:

Department/Agency:

Investigated: No action necessary

Investigated: Requires action

Description of actions:

Hours between call and investigation:

Hours to close incident:

Date case closed:

Notes:

**APPENDIX B
OUTFALL INSPECTION FORM**

Outfall Inspection Form

General Information

Outfall Number: _____ Inspector: _____
Map of location: Ok Incorrect, *explain in Comments* Photo: #: _____
Date: _____ Time: _____
Last Rainfall: Raining now 0-2 days 3< days Unknown
End of Pipe Access: Accessible Inaccessible (If so, describe below)
 Blocked Ground too wet Fence/Gate locked Vegetation Water
Other _____

End of Pipe Information

Flows into? Lake Stream Wetland Ditch Other: _____
End of Pipe Submerged? No Yes *If yes:* 25% 50% 50%<
Does Outfall need repair? No Yes *If yes, describe in Comments*
Grate on end of pipe? No Yes *If yes, is grate locked?* No Yes

Visual Observations

Water flowing from end of pipe? No Yes
If yes, what does the water look like? Clear Muddy Colored, what color? _____
Sediment accumulation in pipe? No Yes
If yes, how much? <25% 25-50% >50%
Debris accumulation in pipe? No Yes
If yes, how much? <25% 25-50% >50%
Describe Debris: _____
Evidence of Illicit Discharge? No Yes
Describe: _____
Evidence of Illicit Connections? No Yes
Describe: _____

Comments (identify any follow-up action or reporting required)

BMP MAINTENANCE FOLLOW-UP FORM
Post-Construction Inspection and Maintenance Report Form

A. GENERAL INFORMATION. Please fill out only one report form per site. (Fill out ALL information)

DATE _____

REPORTING YEAR: _____

Project Name (i.e. Subdivision Name, Store Name):	Physical Address/Location of BMP:
Property Owner Name:	Property Owner Mailing Address:
Is this a new owner? (YES) (NO)	
Property Owner E-mail Address:	Property Owner Telephone Number: ()
Maintenance Contact Person/Inspector Name:	Maintenance Contact/Inspector Telephone Number: ()
Maintenance Contact/Inspector E-mail address:	

B. INSPECTION CHECKLIST & BMP SUMMARY TABLE.

BMP Device Type	Number per Site	BMP Device Type	Number per Site
Bioretention		Filter	
Porous Pavement		Infiltration Basin/Trench	
Detention/Retention Basin or Pond		Other (Specify)	
Open Channel (Swales)		Other (Specify)	

C. MAJOR MAINTENANCE & CORRECTIVE ACTIONS SUMMARY.

Summarize major maintenance activities conducted and any corrective actions taken.

D. SITE PHOTOGRAPHS. Please attach photographs showing current condition of BMPs on site. One panoramic view of the site and one close-up photo of each area are sufficient.

ATTACHMENT
STORMWATER MANAGEMENT PROGRAM–MILESTONE SUMMARY

STORMWATER MANAGEMENT WEB SITE

Lemont Township's (Township) Stormwater Management Web site should include the following items:

1. A copy of this Stormwater Management Program (SWMP)
2. A copy of the Notice of Intent (NOI)
3. Copy of Illicit Discharge Detection and Elimination (IDDE) Plan (to be completed)
4. Copies of the Annual Reports to Illinois Environmental Protection Agency (IEPA)
5. Copy of the Annual Stormwater Pollution Prevention Presentation to the Township Board
6. Stormwater monitoring—enable the general public to post stormwater management concerns and report observed stormwater pollution incidents
7. Provide a stormwater hotline phone number to call with concerns
8. Educational fliers and resources
9. Links to other organization programs and educational materials, including NASA climate change link
10. Calendar of public involvement events
11. Enable tracking of visits to the Web site and visits to the various site offerings

ANNUAL MEASURABLE GOAL REPORT

The following section details the content of the annual report to be compiled in December and issued in January of every year to measure the Township's progress towards its goals. Submit this progress report to IEPA every year.

1. Compile tracking data from stormwater management Web site to determine the number of visits to the various Web site offerings and identify trends of use.
2. Record annual implementation of the Illicit Discharge Detection and Elimination Plan, results of findings, remediation and removal actions taken, and results.
3. Record inventory of stormwater Best Management Practices (BMP) implemented in the past year.
4. Record stormwater pollution issues reported by the public and Townships employees, action taken, and results.

ANNUAL CALENDAR OF ACTIVITIES

This section suggests activities to be performed on an annual basis. Revise as necessary.

January

1. Develop the Annual Measurable Goals report for IEPA.
2. Post the Annual Measurable Goals report to the Web site.
3. Review the status of all open construction projects.
4. Review the status of any open violation notices.
5. Review the status of post-construction inspections performed in the prior year.

February

Promote Citgo-sponsored event focusing on stormwater pollution prevention through hazardous material collection.

March

File Annual Facility Inspection Report to IEPA.

April

Annual Stormwater Pollution Prevention Presentation at Township Board meeting.

May

1. Create a plan of attack to inspect outfalls for illicit discharges during the dry summer months.
2. Consider hiring consultant to help continually enhance storm sewer mapping.

June

Perform dry weather screening of outfalls according to the IDDE Plan.

July

Perform dry weather screening of outfalls according to the IDDE Plan.

August

Perform dry weather screening of outfalls according to the IDDE Plan.

September

Remediate any sites not in compliance with National Pollutant Discharge Elimination System (NPDES) permit. If necessary, report a “non-compliance” to IEPA.

October

Promote Citgo-sponsored event focusing on stormwater pollution prevention through hazardous material collection.

November

Ensure proper storage of deicing materials for upcoming winter season.

December

1. Compile data on implementation of the IDDE Plan in the previous year for inclusion in the Annual Measurable Goals Report.
2. Compile data on the number of visitors to the Stormwater Management Web site.
3. Create/build upon inventory of stormwater BMP implemented in the past year.
4. Review status of all long-term (2-year) operation and maintenance activities from new development.
5. Make any changes to the SWMP.

Perform continuously throughout the year (as needed)

1. Observe any Township-permitted development sites, as well as county-permitted sites, and note any sites without silt fence/erosion control (anything out of compliance). If staff are available, particularly observe sites the day after heavy rainfall.
2. Send staff to monthly meetings that potentially incorporate stormwater training.
3. Check in on development sites occasionally for two years after completion.
4. Acknowledge/approve any permit applications, ensuring owners manage stormwater.
5. In general, keep loose notes of when staff observe sites, attend meetings, etc.

PERMIT PERIOD CALENDAR OF ACTIVITIES

The following section details the activities to be performed in *crucial* years of the permit period.

Year 3 (2019)

1. Create the stormwater management Web site and upload all necessary information.
2. Begin concerted effort to map outfalls within the Township.
3. Decide when to perform environmental justice assessment (this year or next year).
4. Create IDDE Plan and upload to Web site.

Year 5 (2021)

1. January–Update the Township's SWMP.
2. March–Update and submit the Township's NOI.

SWMP AND NOI UPDATES

This SWMP is effective for the NPDES ILR-40 permit period from 2016 into 2021. The Township must update this program in January 2021 and revise and resubmit its NOI in March 2021.

The Township must submit a new NOI within 30 days of a change in the operator(s) or addition of new operator(s) (persons responsible for implementation or coordination of the Township's SWMP).

For more location information
please visit www.strand.com

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