

**CITY OF VALDOSTA**  
**STORM WATER MANAGEMENT PROGRAM (SWMP)**

MINIMUM CONTROL MEASURE (MCM) – D  
CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

40 CFR Part 122.34(b)(4) Requirement: The permittee must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Storm water discharges from construction activity disturbing less than one acre must be included in the permittee's program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include:

- A) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance;
- B) Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;
- C) Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
- D) Procedures for site plan review which incorporate consideration of potential water quality impacts;
- E) Procedures for receipt and consideration of information submitted by the public;  
and
- F) Procedures for site inspection and enforcement of control measures.

**BMP #1: Legal Authority**

1. Description of BMP: The City must ensure that the E&S (or Litter) ordinance requires construction site operators to control waste at the construction site, such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste. The City currently addresses construction waste in the litter ordinance. See Attachment F – Soil Erosion, Sedimentation, and Pollution Control (LDR 306) and Attachment G – Litter Ordinance (2006-23). The City is currently updating the Litter ordinance to include the Code of Federal Regulations required language for construction site waste.
2. Measurable goal(s): The City will evaluate the existing E&S ordinance, and if necessary, modify the ordinance during the reporting period.
3. Documentation to be submitted with each annual report: If the E&S ordinance is revised during the reporting period, the City will provide a copy of the adopted ordinance in each annual report.
4. Schedule:
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation dates (if applicable): 2006 – Adopted  
2013 – Revision  
(Litter Ordinance)
  - c. Frequency of actions (if applicable): As needed – Revisions
  - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department
6. Rationale for choosing BMP and setting measurable goal(s): The E&S ordinance provides regulations that reduce construction activity pollutants from entering waters of the State.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Through enforcement of land disturbance activities, construction sites will handle and dispose of waste materials properly.

**BMP #2: Site Plan Review Procedures**

1. Description of BMP: The City reviews erosion and sedimentation (E&S) site plans submitted for a Land Disturbing Activity (LDA) permit for sites disturbed of 1.0 acre or larger. No LDA permit will be issued without an approved E&S control plan. See Attachment H – Site Plan Review Procedures and Erosion, Sedimentation & Pollution Control Plan Checklist Form.
2. Measurable goal(s): The City will review 100% of the site plans submitted for a LDA permit for sites disturbed of 1.0 acre or larger during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide a list of site plans received and the number of site plans reviewed, approved, or denied in each annual report.
4. Schedule:
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation dates (if applicable): 2004  
2013 – Procedures
  - c. Frequency of actions (if applicable): Continuous
  - d. Month/Year of each action (if applicable): Annually
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Technician
6. Rationale for choosing BMP and setting measurable goal(s): The City is performing this effort as part of its responsibility as an Issuing Authority.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: By requiring the review of 1.0 acres or more, this allows the City to ensure proper design of BMPs, otherwise there is no guarantee.

**BMP #3: Inspection Program**

1. Description of BMP: The City inspects active construction projects within the City limits that obtain Land Disturbing Activity (LDA) permits. Sites are inspected for compliance with their approved Erosion and Sedimentation (E&S) Control Plan. See Attachment I – Construction Site Inspection Procedures and Land Disturbance Permit Site Check List Form.
2. Measurable goal(s): The City will inspect each construction site at a minimum of three times (e.g. following installation of initial best management practices (BMPs), during active construction, and after final site stabilization).
3. Documentation to be submitted with each annual report: The City will provide a list of active construction sites and any inspections conducted during the reporting period in each annual report.
4. Schedule:
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation dates (if applicable): 2004  
2013 – Procedures
  - c. Frequency of actions (if applicable): Three times
  - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Technician
6. Rationale for choosing BMP and setting measurable goal(s): The City is performing this effort as part of its responsibility as an Issuing Authority under the State of Georgia’s Erosion and Sedimentation Control Act.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: By inspecting project BMPs, this will ensure proper installation / maintenance and reduce pollutants from entering waters of the State.

#### **BMP #4: Enforcement Procedures**

1. Description of BMP: The City maintains ordinances that provide legal enforcement authority to address E&S violations. If a violation of the City ordinance is found, then the appropriate enforcement actions are taken, which may include verbal warning, written warning, stop work order, etc. All violations will be investigated and the resolution will be recorded. See Attachment J – Construction Site Enforcement Procedures.
2. Measurable goal(s): The City will respond and document 100% of the E&S violations during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide a summary of all E&S violations, any enforcement actions taken, including the number and type (e.g. Notice of Violation, Stop Work Order) and status (e.g. pending, resolved) in each annual report.
4. Schedule:
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation dates (if applicable): 2004  
2013 – Procedures
  - c. Frequency of actions (if applicable): As needed
  - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Technician
6. Rationale for choosing BMP and setting measurable goal(s): The City is performing this effort as part of its responsibility as an Issuing Authority under the State of Georgia’s Erosion and Sedimentation Control Act.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: If failures are being corrected then the enforcement procedures are effective.

**BMP #5: Complaint Response**

1. Description of BMP: Anyone can submit E&S complaints verbally or in writing to the Engineering Department. Each complaint is logged, investigated, and documented. See Attachment K – Erosion and Sedimentation Complaint Response Procedures.
2. Measurable goal(s): The City will respond and document 100% of the E&S complaints received during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide a summary of the E&S complaints received (e.g. complaint date, type of complaint, complaint status) in each annual report.
4. Schedule:
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation dates (if applicable): 2004  
2013 – Procedures
  - c. Frequency of actions (if applicable): As needed
  - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Technician
6. Rationale for choosing BMP and setting measurable goal(s): The City is performing this effort as part of its responsibility as an Issuing Authority under the State of Georgia’s Erosion and Sedimentation Control Act.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Citizens are provided a way to make a complaint and legitimate issues are resolved.

**BMP #6: Certification**

1. Description of BMP: The City MS4 staff involved in construction activities subject to the Construction General Permits (CGPs) are trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission (GASWCC), including site inspection and enforcement of control measures. See Attachment L – MS4 Certifications - City Engineering Staff.
2. Measurable goal(s): The City will ensure that the MS4 staff involved in construction activities are trained and certified in accordance with the rules adopted by the GASWCC.
3. Documentation to be submitted with each annual report: The City will provide the number and type of current certifications held by MS4 staff in each annual report.
4. Schedule:
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation dates (if applicable): 2005
  - c. Frequency of actions (if applicable): Every two years
  - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Technician
6. Rationale for choosing BMP and setting measurable goal(s): The City is performing this effort as part of its responsibility as an Issuing Authority under the State of Georgia’s Erosion and Sedimentation Control Act.
7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Properly trained inspectors are able to identify problem areas for correction.