

CITY OF VALDOSTA
STORM WATER MANAGEMENT PROGRAM (SWMP)

MINIMUM CONTROL MEASURE (MCM) – F
POLLUTION PREVENTION / GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

40 CFR Part 122.34(b)(6) Requirement: The permittee must develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Using training materials available from the USEPA and other organizations as guidance, the permittee must, as a part of this program, include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.

BMP #1: MS4 Control Structure Inventory and Map

1. Description of BMP: The City maintains an inventory and map of the MS4 control structures. At a minimum, the inventory and map must include catch basins, ditches, (miles or linear feet), detention/retention ponds, and storm drain lines (miles or linear feet). See Attachment B – Storm Sewer System Maps and Inventory.
2. Measurable goal(s): The City will update the inventory as new structures are added during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide the number of structures added during the reporting period and the total number of structures in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation dates (if applicable): 2006
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: GIS / Property Acquisition Coordinator
6. Rationale for choosing BMP and setting measurable goal(s): Due to the complexity and age of the stormwater system it is important to have it mapped for the overall function, which is dependent on inspection, maintenance and familiarity of the system.
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 keeping the stormwater infrastructure up-to-date and digitally available, this will allow for improved maintenance records and management of the system as it continues to grow and change.

BMP #2: MS4 Inspection Program

1. Description of BMP: The City conducts inspections on the MS4 control structures (e.g. catch basins, ditches, ponds, and storm pipe) so that 100% are inspected within the 5-year permit term. Each inspection is documented and tracked using GIS technology, where applicable. See Attachment P – MS4 Inspection, Maintenance and Waste Disposal Procedures and Stormwater System Inspection Form.
2. Measurable goal(s): The City will inspect 20% of the MS4 control structures during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide the number and percentage of control structures inspected in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation dates (if applicable): N/A
 - c. Frequency of actions (if applicable): Continuous
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager
6. Rationale for choosing BMP and setting measurable goal(s): Routinely inspecting control structures, this will help prevent potential nuisances, reduce the need for repair maintenance, and reduce the chance of polluting stormwater runoff by finding and fixing problems.
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 control structures on a routine basis, this will help to ensure that they are being properly maintained, functioning, and if any deficiencies are found to be addressed in a timely manner.

BMP #3: MS4 Maintenance Program

1. Description of BMP: The City conducts maintenance on the MS4 control structures (e.g. catch basins, ditches, and storm pipes) as needed. Maintenance will be documented and tracked using GIS technology, where applicable. See Attachment P - MS4 Inspection, Maintenance and Waste Disposal Procedures.
2. Measurable goal(s): The City will perform maintenance, as needed, on MS4 control structures and document activities during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide the number of each type of structure maintained in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation dates (if applicable): N/A
 - c. Frequency of actions (if applicable): Continuous
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager
6. Rationale for choosing BMP and setting measurable goal(s): Routine maintenance of catch basins, ditches, and storm pipes helps to prevent potential nuisances, reduce the need for repair maintenance, and reduce the chance of polluting stormwater runoff by finding and fixing problems.
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 performing regular maintenance this will help maintain the proper operation of the MS4, while also reducing the amount of debris reaching the waters of the State.

BMP #4: Street and Parking Lot Cleaning

1. Description of BMP: The City utilizes street sweepers to remove debris from City streets with curb to reduce the amount entering the stormwater system and aesthetic purposes. All public street sweeping is performed by city staff and equipment. All debris is collected in a designated dumpster/roll off and disposed of at a landfill. See Attachment R – Street Sweeper Routes Mapbook. As of October 2014, the City entered into an annual agreement for a private contractor to perform maintenance for city parking lots. As stated in the contract, all debris must be disposed of in a way that meets all applicable Federal, State, and local laws and ordinances and within the industry best practices.
2. Measurable goal(s): The City will sweep at a minimum 800 miles of streets during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide the total number of miles swept and amount of debris collected / disposed of at the landfill in each annual report. Please note that the volume / total amount of debris collected will be for ALL stormwater activities (e.g. street sweeping, catch basins, etc.) since all material is placed in one dumpster prior to being taken to the landfill.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation dates (if applicable): N/A
 - c. Frequency of actions (if applicable): As weather permits
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Public Works Department and Engineering Department
6. Rationale for choosing BMP and setting measurable goal(s): By removing debris from the streets this will help improve safety along the roads and reduce debris from entering the catch basins, storm pipes and waterways.
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: Street sweeping reduces pollutants from entering the waters of the State.

BMP #5: Employee Training

1. Description of BMP: The City provides educational opportunities to employees on the importance of stormwater management and pollution prevention (e.g. email blasts, online training, classroom training, etc).
2. Measurable goal(s): The City will send three email blasts and provide one additional training opportunity during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide documentation of the number of employees and the educational information shared in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation dates (if applicable): 2006
 - c. Frequency of actions (if applicable): Various
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager
6. Rationale for choosing BMP and setting measurable goal(s): By educating employees on stormwater pollution, this will increase their awareness on illicit discharges, dumping and spills so that they can recognize, change and report problems.
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: Educating city employees is one of the most important aspects of pollution prevention and good housekeeping.

BMP #6: Waste Disposal

1. Description of BMP: The City removes debris from catch basins, other structures, and during street sweeping activities as part of the maintenance of the MS4. The collected debris is placed in a dumpster and disposed of at the landfill. Please note that the volume will be for ALL stormwater activities, not individual activities, since all material is placed in one dumpster prior to being taken to the landfill where the debris will be weighed. See Attachment P – MS4 Inspection, Maintenance, and Waste Disposal Program Procedures.
2. Measurable goal(s): The City will follow the waste disposal procedures when debris is removed from the MS4 during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide the total number of structures cleaned and the volume of debris disposed of in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation dates (if applicable): 2013 – Develop Procedures
 - c. Frequency of actions (if applicable): Continuous
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager
6. Rationale for choosing BMP and setting measurable goal(s): The cleaning and removal of debris from the MS4 will reduce the amount of pollutants and trash from entering the 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: The Stormwater Division will document all MS4 inspections and cleanings.

BMP #7: New Flood Management Projects

1. Description of BMP: The City will evaluate new municipal flood management projects (e.g. detention / retention ponds) as of December 6, 2012 to ensure they are assessed for water quality impacts during the design phase. See Attachment S – Flood Management Project Design Checklist and Water Quality Improvement Worksheet: Proposed MS4 Facility Forms.
2. Measurable goal(s): The City will document the plans reviewed where flood management projects were assessed for water quality impacts during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide the number of plans reviewed where flood management projects were assessed for water quality impacts in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation dates (if applicable): N/A
 - 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): To ensure all proposed flood management projects are designed for water quality to prevent further degradation of 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: By addressing water quality impacts at the design phase, this will reduce pollution significantly and provide long term water quality benefits.

BMP #8: Existing Flood Management Projects

1. Description of BMP: The City will conduct an assessment of the existing publicly-owned flood management projects (e.g. detention / retention ponds) for potential retrofitting to address water quality impacts so that 100% are evaluated within the 5-year permit term. See Attachment T – Water Quality Improvement Worksheet: Existing MS4 Facility Form.
2. Measurable goal(s): The City will assess 20% of the existing publicly – owned flood management projects during the reporting period.
3. Documentation to be submitted with each annual report: The City will provide a summary of the flood management projects assessed in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation dates (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - 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): By evaluating the existing ponds, this will provide the potential to expand the function for a pond that only address volume to include water quality benefits.
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 identifying the ponds that need to be modified and tracking the completion date of each retrofit.

BMP #9: Municipal Facilities

1. Description of BMP: The City maintains the inventory of municipal facilities with the potential to cause pollution. See Attachment U – Municipal Facilities Inspection List. The Pollution Prevention Plan of each facility with a significant capability to discharge hazardous chemicals into the waters of the State will be audited. See Attachment V – Municipal Facility Pollution Prevention Plans Inspection Form.
2. Measurable goal(s): The City will inspect all facilities within the 5 – year permit term.
3. Documentation to be submitted with each annual report: The City will provide documentation of the inspections conducted in each annual report.
4. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation dates (if applicable): 2007
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Environmental Manager
6. Rationale for choosing BMP and setting measurable goal(s): It is necessary to provide for the proper storage and containment of chemicals, lubricants and fuels to prevent accidental discharge to the 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: By inventorying all facilities with the potential to negatively impact water quality and routinely inspect each facility, actions will be taken to prevent pollutants from being released into waters of the State.