VALDOSTA
A City Without Limits
ENGINEERING DEPARTMENT

June 2, 2023

Veronica Craw
Georgia Environmental Protection Division
Watershed Protection Branch
2 Martin Luther King Dr. SE, East Tower, Suite 1452 East
Atlanta, GA 30334

Re: Phase II Municipal Separate Storm Sewer System (MS4)
NPDES Permit No. GAG610000
Stormwater Management Program (SWMP) 2022 - 2027

Dear Ms. Craw,

On December 6, 2022, the Georgia Environmental Protection Division (EPD) reissued NPDES Permit No. GAG610000 authorizing the discharge from the City of Valdosta's municipal separate storm sewer system (MS4) to waters of the State. As part of the permit, the City is required to submit a new SWMP, which is enclosed for your review. Included in the SWMP are a total of 35 best management practices (BMPs) that meet the requirement for each of the Minimum Control Measures (MCM).

If you have any questions or need additional information, please feel free to contact me at any time at (229) 259-3530 or by email at akbray@valdostacity.com.

Sincerely,

Angela K. Bray
Stormwater Manager

Cc: Mildred A. Granderson, GA EPD
Richard Hardy, City of Valdosta
Ben O'Dowd, City of Valdosta

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1470, East Tower
Atlanta, Georgia 30334
404-463-1511

GEORGIA NOTICE OF INTENT (NOI)

General NPDES Permit No. GAG610000 for
Phase II Municipal Separate Storm Sewer Systems (MS4)

1. General Information

A. Name of small MS4: City of Valdosta

B. If the MS4 is a City, provide the County where located: Lowndes

C. Name of responsible official: Mark Barber
Title: City Manager
Mailing Address: P.O. Box 1125
City: Valdosta State: GA Zip Code: 31603-1125
Telephone Number: 229-259-3500
Email Address: mbarber@valdostacity.com

D. Designated stormwater management program contact:
Name: Angela K. Bray
Title: Stormwater Manager
Mailing Address: 300 N Lee St.
City: Valdosta State: GA Zip Code: 31601
Telephone Number: 229-259-3530
Email Address: akbray@valdostacity.com

E. Provide the river basin(s) to which your MS4 discharges: Alapaha and Withlacoochee

F. Provide the latitude and longitude of the MS4 center (e.g. City Hall, County offices, MS4 mailing address) using Global Positioning System (GPS) – WGS84:
Latitude: 30°49'59"N Longitude: 83°16'40"W

2. Sharing Responsibility

A. Has another entity agreed to implement a control measure or BMP on your behalf? Yes_____ No ____X____ (If No, skip to Part 3)

Control Measure #1:

1. Name of entity_____

2. Control measure or component of control measure to be implemented by entity on your behalf: _____

_____

B. Attach an additional page if necessary to list additional shared responsibilities. **It is mandatory that you submit a copy of a written agreement between your MS4 and the other entity demonstrating written acceptance of responsibility.**

3. Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: L. Mark Barber Date: Sept. 22, 2022

Signature: L. Mark Barber Title: City Manager

CITY OF VALDOSTA
STORM WATER MANAGEMENT PROGRAM (SWMP)

MINIMUM CONTROL MEASURE (MCM) – A
PUBLIC EDUCATION AND OUTREACH ON STORM WATER IMPACTS

40 CFR Part 122.34(b)(1) Requirement: The permittee must implement a public education program to distribute educational materials to the community and/or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.

Best Management Practice (BMP) #1: Stormwater Presentations

1. Target audience: General Public

2. Description of BMP: The City provides education opportunities to schools and government officials on the municipal stormwater program, the impacts of pollution, and outreach activities through presentations, the use of the EnviroScape Watershed / Non – Point Source Model and/or other educational tools.

3. Measurable goal(s): The City will present stormwater information at a minimum of two school events and two government events during the reporting period.

4. Documentation to be submitted with each annual report: The City will provide a summary of each event that includes the event date, number of attendees, and information provided in each annual report.

5. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2006
   c. Frequency of actions (if applicable): Four events
   d. Month/Year of each action (if applicable): Annually

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager

7. Rationale for choosing BMP and setting measurable goal(s): Public presentations provide educational opportunities to the general public, while also developing partnerships.

8. 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 benefits of providing children and adults with information that they can relate to and understand can be difficult to measure, but is an effective way to instill environmental awareness and change habits for all ages.

BMP #2: Education through Media Outlets

1. Target audience: General Public

2. Description of BMP: The City has various media outlets to share information with the public, including Metro Valdosta *Channel 17*, press releases, etc. *Channel 17* is a local news station that is operated by the City and serves Valdosta. Educational information will be provided to raise awareness and interest in stormwater management.

3. Measurable goal(s): The City will promote stormwater information on *Channel 17* a minimum of six times during the reporting period.

4. Documentation to be submitted with each annual report: The City will provide a summary of the information shared on *Channel 17* (e.g. month, story title, etc) in each annual report.

5. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2006
   c. Frequency of actions (if applicable): Six times
   d. Month/Year of each action (if applicable): Annually

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager / Public Information Officer / Media Coordinator

7. Rationale for choosing BMP and setting measurable goal(s): Promoting stormwater through *Channel 17* and other forms of media are great opportunities to share information with the community and available to anyone with cable and/or internet.

8. 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 benefits of providing the public with information can be difficult to measure, but utilizing television, which is the primary source of news based on EPA's website, is an effective way to promote environmental awareness.

BMP #3: Education through Promotional Items/Giveaways

1. Target audience: General Public

2. Description of BMP: The City uses promotional items/giveaways (e.g. rain barrels, pens, cups, pet waste bags, etc.) to raise awareness and interest in stormwater management.

3. Measurable goal(s): The City will provide promotional items/giveaways at three events during the reporting period.

4. Documentation to be submitted with each annual report: The City will provide a summary of each event that includes the event date, number of attendees, pictures, and information provided in each annual report.

5. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2018
   c. Frequency of actions (if applicable): Three event
   d. Month/Year of each action (if applicable): Annually

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager

7. Rationale for choosing BMP and setting measurable goal(s): Promotional items/giveaways can have a wide reach and expand stormwater awareness.

8. 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 benefits of providing the public with promotional items/giveaways can be difficult to measure, but the use of promotional items is a cost-effective marketing strategy to promote environmental awareness.

BMP #4: Education through Municipal Website

1. Target audience: General Public

2. Description of BMP: The City uses its website, www.valdostacity.com to disseminate stormwater related information. Visitors to the website are able to learn more about the City's stormwater program, ways they may cause water pollution, how it affects our environment, and opportunities to reduce the negative impacts of stormwater pollution.

3. Measurable goal(s): The City will update the stormwater related webpages as needed during the reporting period.

4. Documentation to be submitted with each annual report: The City will provide a summary of the stormwater related webpages and the dates that they were updated in each annual report.

5. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2006
   c. Frequency of actions (if applicable): As needed
   d. Month/Year of each action (if applicable): N/A

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager

7. Rationale for choosing BMP and setting measurable goal(s): The City website is available to a large portion of the population and is a good way to distribute stormwater information.

8. 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 benefits of providing the public with information can be difficult to measure, but the use of websites can allow for easy access 24 hours / day.

CITY OF VALDOSTA
STORM WATER MANAGEMENT PROGRAM (SWMP)

MINIMUM CONTROL MEASURE (MCM) – B
PUBLIC INVOLVEMENT / PARTICIPATION

40 CFR Part 122.34(b)(2) Requirement: The permittee must, at a minimum, comply with State and local public notice requirements when implementing a public involvement/ participation program.

Best Management Practice (BMP) #1: Storm Drain Marking Program

1. Target audience: Volunteers

2. Description of BMP: The City utilizes volunteers to apply storm drain markers that read "No Dumping Drains to Creek" to catch basins and distribute door hangers within the City limits. The City provides all necessary supplies, safety equipment, and a map of the catch basins to be marked.

3. Measurable goal(s): The City will host three storm drain marking events during the reporting period.

4. Documentation to be submitted with each annual report: The City will provide a summary that includes the event date, number of participants, number of storm drain markers installed, number of door hangers distributed and location in each annual report.

5. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2006
   c. Frequency of actions (if applicable): Three events
   d. Month/Year of each action (if applicable): Annually

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager

7. Rationale for choosing BMP and setting measurable goal(s): By placing storm drain markers throughout the City, this will raise awareness on urban runoff and discourage practices that generate non – point source pollution.

8. 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 raising public awareness of urban runoff, the storm drain marking program should discourage practices that generate stormwater pollution.

BMP #2: Stream Cleanup

1. Target audience: Volunteers

2. Description of BMP: The City will organize, promote and participate in the annual River's Alive event on a local stream(s).

3. Measurable goal(s): The City will participate in the annual River's Alive event during the reporting period.

4. Documentation to be submitted with each annual report: The City will provide a summary of the event results (e.g. locations, number of volunteers / organization, and volume of trash collected) and media coverage (if available) in each annual report.

5. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 1998
   c. Frequency of actions (if applicable): One event
   d. Month/Year of each action (if applicable): Annually

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager

7. Rationale for choosing BMP and setting measurable goal(s): Trash management and annual cleanups increases the aesthetic quality of our community, encourages public involvement, raises awareness and reduces the amount of trash entering our waterways.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: River cleanups are hands – on opportunities that are effective at increasing public awareness of pollution sources and will help keep trash and debris out of the streams.

BMP #3: Great American Cleanup

1. Target audience: Volunteers

2. Description of BMP: The City will organize, promote and participate in the annual Great American Cleanup event.

3. Measurable goal(s): The City will participate in the annual Great American Cleanup event during the reporting period.

4. Documentation to be submitted with each annual report: The City will provide a summary of the event results (e.g. locations, number of volunteers / organization, and volume of trash collected) and media coverage (if available) in each annual report.

5. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 1998
   c. Frequency of actions (if applicable): One event
   d. Month/Year of each action (if applicable): Annually

6. Person (position) responsible for overall management and implementation of the BMP: Sustainability Coordinator / Public Works Administrator

7. Rationale for choosing BMP and setting measurable goal(s): Trash management and annual cleanups increases the aesthetic quality of our community, encourages public involvement, raises awareness and reduces the amount of trash entering our waterways.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Great American Cleanups are hands – on opportunities that are effective at increasing public awareness of pollution sources and will help keep trash and debris out of the streams.

BMP #4: Electronic Recycling Event

1. Target audience: Volunteers

2. Description of BMP: The City will organize, promote and participate in one Electronic Recycling Event.

3. Measurable goal(s): The City will participate in one Electronic Recycling Event during the reporting period.

4. Documentation to be submitted with each annual report: The City will provide a summary of the event results (e.g. locations, number of volunteers / organization, and volume of trash collected) and media coverage (if available) in each annual report.

5. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2006
   c. Frequency of actions (if applicable): One event
   d. Month/Year of each action (if applicable): Annually

6. Person (position) responsible for overall management and implementation of the BMP: Sustainability Coordinator / Public Works Administrator

7. Rationale for choosing BMP and setting measurable goal(s): Electronic recycling encourages public involvement, raises awareness and reduces the amount of e-waste entering our waterways.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Electronic recycling events are hands – on opportunities that are effective at increasing public awareness of pollution sources and will help keep trash and debris out of the streams.

CITY OF VALDOSTA
STORM WATER MANAGEMENT PROGRAM (SWMP)

MINIMUM CONTROL MEASURE (MCM) – C
ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

40 CFR Part 122.34(b)(3) Requirement: The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges into your small MS4. You must:

A) Develop, if not already completed, a 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;

B) Effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions;

C) Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to your system;

D) Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and

E) Address the following categories of non-stormwater discharges or flows only if they are identified as significant contributors of pollutants to the MS4:
   - Water line flushing;
   - Landscape irrigation;
   - Diverted stream flows;
   - Rising ground waters;
   - Uncontaminated ground water infiltration (as defined in 40 CFR Part 35.2005(20));
   - Uncontaminated pumped ground water;
   - Discharges from potable water sources;
   - Foundation drains;
   - Air conditioning condensation;
   - Irrigation water;
   - Springs;
   - Water from crawl space pumps;
   - Footage drains;
   - Lawn watering;
   - Individual residential car washing;
   - Flows from riparian habitats and wetlands;
   - Swimming pool discharges
   - Street wash water; and
   - Flows from firefighting activities.

BMP #1: Legal Authority

1. Description of BMP: The City must prohibit through ordinance, or other regulatory mechanisms, non – stormwater discharges into the MS4 and implement appropriate enforcement procedures and actions. The City adopted the Illicit Discharge and Illegal Connections Ordinance on December 11, 2008. See Attachment A – *Illicit Discharge and Illegal Connections Ordinance*

1. Measurable goal(s): The City will evaluate the existing illicit discharge ordinance, and if necessary, modify the ordinance during the reporting period.

2. Documentation to be submitted with each annual report: If the ordinance is revised during the reporting period, the City will provide a copy of the adopted ordinance in the annual report.

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2008 – Adopted
   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: Utilities Department

6. Rationale for choosing BMP and setting measurable goal(s): An illicit discharge ordinance protects the public health, safety, environment and general welfare by controlling the introduction of pollutants into the stormwater system and provides enforcement procedures and actions.

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 regular inspections illicit discharges will be identified and addressed.

BMP #2: Outfall Map and Inventory

1. Description of BMP: The City inventoried the stormwater system using GIS in 2006. Currently, the City's outfall inventory total is 783. From this information, the city developed a 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. See Attachments B(1-4) – *Storm Sewer System Maps and Inventory*

2. Measurable goal(s): The City will update the current outfall inventory list and map showing any outfalls added during the reporting period.

3. Documentation to be submitted with each annual report: The City will provide a summary to include the current outfall inventory and an updated map 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: Stormwater Manager and GIS / Real Property Coordinator

6. Rationale for choosing BMP and setting measurable goal(s): It is important to continuously maintain the stormwater system information to identify problems and ensure proper functions.

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 having accurate information, the City's IDDE program can respond quickly and take the necessary steps to ensure a successful program.

BMP #3: IDDE Plan (Dry Weather Screening / Outfall Inspections)

1. Description of BMP: The City conducts dry weather screening inspections so that 100% of the outfalls are inspected within the 5 – year permit term. Currently, the City's outfall inventory total is 783. Staff will follow the *Dry Weather Screening Inspections and Investigative Procedures* and record each inspection on the *Dry Weather Outfall Screening Form* (See Attachments C(1-2)). All documented flows will be source traced.

TABLE 1

WATER QUALITY TEST	COMMENTS / SUGGESTED RANGES
Conductivity	Measured in the field with a probe / Less than 300 micromhos (µmho/cm). If greater than 300 µmho/cm, take grab sample and provide to POTW laboratory for fecal coliform testing
Surfactants	Measured with detergent test / Less than 0.2 mg/l. If found to be significantly high, send sample to contract laboratory
pH	Measured in the field and laboratory with a probe / pH is 6-9 standard units (su)
Temperature	Measured in the field with a probe / Temperature should be near or below ambient conditions for groundwater or stormwater runoff
Fluoride	Measured in the field with a meter / Less than 0.2 mg/L

*In addition to these parameters, the following field observations are conducted: Flow, Odor, Color, Turbidity and Floatables

2. Measurable goal(s): The City will conduct dry weather screening inspections on 20% of the outfalls during the reporting period. If an illicit discharge is found, the city will document, through a spreadsheet, any illicit discharge detection activities performed and follow – up / enforcement actions taken to eliminate illicit discharges. If the source of the illicit discharge is derived from an adjacent MS4, the City will notify that MS4.

3. Documentation to be submitted with each annual report: The City will provide the number and percentage of outfall inspections conducted and hard copies of the inspection forms. If an illicit discharge is found, any activities performed will be provided through a spreadsheet, including eliminated discharges and/or enforcement actions, per the ERP in each annual report.

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2010 – IDDE Manual
      2013 – Develop 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: Environmental Technician

6. Rationale for choosing BMP and setting measurable goal(s): The detection and elimination of illicit discharges is important to protect and restore urban 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: By routinely inspecting outfalls this will help to ensure the stormwater system is operating properly, while also identifying and eliminating illicit discharges.

BMP #4: Education

1. Description of BMP: The City will disseminate educational material to the public, businesses, and government employees about the hazards of illicit discharges.

2. Measurable goal(s): The City will provide at a minimum one educational document to the public, businesses and government employees about the hazards of illicit discharges during the reporting period.

3. Documentation to be submitted with each annual report: The City will provide a summary that includes the date, type of educational information, and method of how it was shared 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): Once
   d. Month/Year of each action (if applicable): Annually

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager

6. Rationale for choosing BMP and setting measurable goal(s): Educating the community about the negative impact of illicit discharges can help identify problems that may be occurring and have a positive effort on the environment when eliminated.

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 benefits of providing the public with information can be difficult to measure, but is an effective way to instill environmental awareness and change habits.

BMP #5: Complaint Response

1. Description of BMP: The City maintains ordinances that give legal enforcement authority to require all illicit connections to the drainage system to be discontinued. When an illicit discharge is detected, either through concerned citizen reports or departmental monitoring, source tracking methods are used such as observation and backtracking the discharge so that it can be eliminated. See Attachments E(1-2) – *Illicit Discharge Complaint Response Procedures & Form.*

2. Measurable goal(s): The City will document each illicit discharge related complaint received during the reporting period.

3. Documentation to be submitted with each annual report: The City will provide a summary that includes the complaint date, date of investigation, type of complaint, and complaint status in each annual report.

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2006 – Respond / Document
      2013 – Develop Procedures
   c. Frequency of actions (if applicable): As needed
   d. Month/Year of each action (if applicable): Annually

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager / Environmental Manager / Utilities Director

6. Rationale for choosing BMP and setting measurable goal(s): By tracking the illicit connections complaints this will assist with record keeping and monitoring problem areas.

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 citizen complaint process is a great opportunity for citizens and the local government to work together and will be effective if the proper information is collected, provided to the appropriate authority, and investigated in a timely manner.

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 (E&S) controls, as well as sanctions to ensure compliance, to the extent allowable, under State or local law;

B) Requirements for construction site operators to implement appropriate E&S 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 water quality impacts;

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 (2013-30)*.

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(1-2) – *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 in accordance with the Georgia Soil & Water Conservation Commission (GSWCC) requirements 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, and the total number of LDA permits issued 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 / City Engineer

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(1-2) – *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 the number and dates of 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 / City Engineer

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) status (e.g. pending, resolved) and the amount of any assessed penalties 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 / City Engineer

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 and investigated 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 and investigated (e.g. complaint date, type of complaint, investigation date and 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 / City Engineer

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 / City Engineer

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.

CITY OF VALDOSTA
STORM WATER MANAGEMENT PROGRAM (SWMP)

MINIMUM CONTROL MEASURE (MCM) – E
POST – CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

40 CFR Part 122.34(b)(5) Requirement: The permittee must develop, implement, and enforce a program to address storm water runoff into the MS4 from new development and redevelopment projects, including projects less than one acre if they are part of a larger common plan of development or sale. You must:

A) Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;
B) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development or redevelopment projects; and
C) Ensure adequate long-term operation and maintenance of BMPs.

BMP #1: Legal Authority

1. Description of BMP: The City must use an ordinance or other regulatory mechanism to address post – construction runoff from new development and redevelopment projects to the extent allowable under State and local law. See Attachment M – *Stormwater Ordinance (2006-71)*

2. Measurable goal(s): The City will annually evaluate the existing stormwater ordinance, and if necessary, modify the ordinance during the reporting period.

3. Documentation to be submitted with each annual report: If the ordinance is revised during the reporting period, the City will provide a copy of the adopted ordinance with the annual report.

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2006
   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 / City Engineer

6. Rationale for choosing BMP and setting measurable goal(s): The stormwater ordinance ensures that controls are in place that will prevent or minimize water quality impacts.

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 the stormwater ordinance, this will ensure that post – construction stormwater is being handled properly.

BMP #2: Inventory

1. Description of BMP: The City updates the inventory annually of all publicly owned post – construction stormwater management structures (e.g. detention / retention ponds, water quality vaults, infiltration structures) and only those privately – owned structures designed after the December 9, 2008 deadline for adoption of the GSMM (e.g. new structures). The inventory shall include information on the number and type of structures, and ownership (e.g. publicly – owned, privately owned). The inventory must be updated as new structures are completed or existing structures are identified. The City will ensure that maintenance agreements are executed for all newly designed non-permittee owned structures. See Attachment V – *Post Construction Inventory*.

2. Measurable goal(s): The City will update the inventory annually to include structures added during the reporting period.

3. Documentation to be submitted with each annual report: The City will provide the revised inventory in each annual report.

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2006 – Inventory
   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 / Real Property Coordinator / City Engineer

6. Rationale for choosing BMP and setting measurable goal(s): It is important to continuously maintain the post – construction information to identify problems and ensure proper functions.

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 having accurate information, the City can respond quickly and take the necessary steps to ensure proper function of the post – construction structures.

BMP #3: Inspection Program

1. Description of BMP: The City inspects all city and private maintained post-construction stormwater management structures, so that 100% are inspected within the 5-year permit term. Each inspection is documented and if maintenance and/or repairs are needed, the owner will be notified. See Attachment N – *Operation and Maintenance Inspection Report for Stormwater Management Ponds Form.* For information on the City Inspection Program, see Attachment O(1-2) – *MS4 Inspection, Maintenance and Waste Disposal Procedures*.

2. Measurable goal(s): The City will inspect 20% of all post-construction stormwater management structures included on the updated inventory list during the reporting period.

3. Documentation to be submitted with each annual report: The City will provide a summary of all inspections to include the number and percentages of the total structures inspected and hard copies of 20% of the inspections in each annual report.

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2006
      2013 – Procedures
   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 (Private) and Maintenance Technician (City)

6. Rationale for choosing BMP and setting measurable goal(s): Routine inspections 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 each pond 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 #4: Maintenance Program

1. Description of BMP: The City implements a long-term operation and maintenance program for post-construction stormwater management structures. At a minimum, the maintenance program must address all permittee-owned structures and those publicly-owned structures owned by other entities (e.g. Board of Education) and those privately-owned structures with construction completed after the effective date of the previous permit (December 6, 2012). For information on the City Inspection Program, see Attachment O(1-2 – *MS4 Inspection, Maintenance and Waste Disposal Procedures*.

2. Measurable goal(s): The City will document maintenance, as needed, on both public and private ponds to ensure proper function during the reporting period.

3. Documentation to be submitted with each annual report: The City will provide the pond inventory, ownership, and maintenance activities and / or maintenance agreement during the reporting period in each annual report, to include:

   Permittee-Owned Ponds
   The City will provide a list of structures maintained and the type of maintenance performed, including documentation of maintenance activities performed during the reporting period.

   Privately-Owned Pond
   The City will provide a list of structures and note whether the city and/or the owner/operator performs maintenance. If the city conducts the maintenance, a list of structures maintained and the type of maintenance performed, including documentation of maintenance activities performed will be provided in each annual report. If maintenance is to be performed by an owner/operator in accordance with a maintenance agreement, the city will retain copies of the maintenance agreements and submit a summary list of these agreements with each annual report. See Attachment T – *Stormwater Facility Maintenance Agreement*

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): December 2012
   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): Routine maintenance helps prevent potential nuisances, reduces the need for repair maintenance, and reduces 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 to ensure the structure is functioning properly and minimize health and safety issues, property damage, etc.

BMP #5: Green Infrastructure/Low Impact Development (GI/LID) Program

1. Description of BMP: The City will evaluate its current GI/LID program prepared during the previous permit iteration (2017 – 2022) to determine if revisions are necessary. The program will describe the GI/LID practices (e.g., better site planning techniques, better site design techniques) to be implemented. The City will continue to review its building codes, ordinances, and other regulations to ensure that they do not prohibit or impede the use of GI/LID's. *See Attachment P(1) – Valdosta GI/LID Program*.

2. Measurable goal(s): The GI/LID Program will be submitted to EPD with the SWMP. The program will become part of the SWMP and will be implemented by the City.

3. Documentation to be submitted with each annual report: If the GI/LID Program is revised during the reporting period, the revised program will be submitted to EPD with the annual report.

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2020
   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 Manager

6. Rationale for choosing BMP and setting measurable goal(s): Green infrastructure / LID are approaches that communities can choose to maintain healthy waters and provide multiple environmental 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 incorporating natural processes into the built environment, stormwater management can be improved.

BMP #6: Green Infrastructure/Low Impact Development (GI/LID) Structure Inventory

1. Description of BMP: The City will annually update an inventory of water quality – related GI/LID structures located within the permitted area and at a minimum, constructed December 6, 2012, including the total number of each type of structure (e.g. bioswales, pervious pavement, rain gardens, cisterns, and green roofs). See attachment P(2) – *GI/LID Structure Inventory List.* At a minimum, the inventory must include permittee-owned structures owned by other entities, and privately-owned non-residential GI/LID structures.

2. Measurable goal(s): The City will document each GI/LID structure constructed during the reporting period.

3. Documentation to be submitted with each annual report: The City will provide an updated GI/LID inventory, including those structures added during the reporting period in each annual report..

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): August 2013 (Inventory)
   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): Green infrastructure / LID are approaches that communities can choose to maintain healthy waters and provide multiple environmental 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 incorporating natural processes into the built environment, stormwater management can be improved.

BMP #7: Green Infrastructure/Low Impact Development (GI/LID) Inspection Program

1. Description of BMP: The City will conduct inspections and/or ensure that inspections are conducted on 100% of the GI/LID structures included in the inventory within a 5 – year permit term, in accordance with the procedures described in the SWMP.

2. Measurable goal(s): The City will conduct inspections and/or ensure that inspections are conducted on 100% of the GI/LID inventory structures within a 5 – year permit term. At minimum, the City will conduct inspections on 20% of the structures during each reporting period.

3. Documentation to be submitted with each annual report: The City will provide documentation of all inspection activities. The number and percentage of total structures inspected and documentation of inspections by the City will be submitted in each annual report.

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2020
   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): Green infrastructure / LID are approaches that communities can choose to maintain healthy waters and provide multiple environmental 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 incorporating natural processes into the built environment, stormwater management can be improved.

BMP #8: Green Infrastructure/Low Impact Development (GI/LID) Maintenance Program

1. Description of BMP: The City will implement a maintenance program for GI/LID structures in accordance with the procedures described in the SWMP. The City will ensure all structures are maintained and provide documentation of maintenance performed on all GI/LID structures as needed.

2. Measurable goal(s): The City will ensure that maintenance of these structures is carried out during the reporting period.

3. Documentation to be submitted with each annual report: The City will provide a an updated summary list of all maintenance agreements and documentation of any activities in each annual report.

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2020
   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): Green infrastructure / LID are approaches that communities can choose to maintain healthy waters and provide multiple environmental 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 incorporating natural processes into the built environment, stormwater management can be improved.

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 underground detention and storm drain lines (miles or linear feet) owned and/or operated by the City. See *Attachments Q(1-6 Maps) and Q(7) Inventory.*.

2. Measurable goal(s): The City will update the map and inventory as new structures are added during the reporting period.

3. Documentation to be submitted with each annual report: The City will provide updated maps and inventories, 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 / Real Property 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. The City has a full-time position that inspects control structures daily, weather permitting. See Attachment O(2) – *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 the total structures inspected and submit 10% of completed inspection forms for each structure type 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 O - M*S4 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 and documentation of maintenance activities conducted during the reporting period 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 and parking lots to reduce the amount entering the stormwater system and aesthetic purposes. As of January 2018 all public street and parking lot 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 Map*.

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, amount of debris collected / disposed of at the landfill and landfill tickets in each annual report. Please note that the volume / total amount of debris collected will be for ALL stormwater activities (e.g. street and parking lot sweeping, catch basins, etc.) since all material is placed in a 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: Stormwater Manager

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 topics such as good housekeeping at municipal facilities, illicit discharge detection, construction site inspections, green infrastructure, etc. (e.g. email blasts, online training, classroom training, etc). The program will include a description of the employee categories to be trained, the methods for providing the training, topics to be addressed and the documentation in each annual report.

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 O – *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, the total amount of MS4 waste collected and submit documentation of the final disposal in each annual report.

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation dates (if applicable): 2013
   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, 2017 to ensure they are assessed for water quality impacts during the design phase. See Attachment S - *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 a list of plans reviewed where flood management projects were assessed for water quality impacts and note the plans that resulted in improved pollutant reduction 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 / City Engineer

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 permittee – owned flood management projects (e.g. detention / retention ponds) for potential retrofitting to address water quality impacts and conduct any retrofitting activities so that 100% are evaluated within the 5-year permit term. See Attachment S – *Water Quality Improvement Worksheet: Existing MS4 Facility Form.*

2. Measurable goal(s): The City will assess at least one structure annually and if the City has less than 5 structures, then the City will assess 100% within a 5 – year period

3. Documentation to be submitted with each annual report: The City will provide a summary of the flood management projects assessed and / or retrofitted 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 / City Engineer

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 updates and 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 T – *Municipal Facility Form.*

2. Measurable goal(s): The City will conduct inspections on 100% of its municipal facilities within the 5 – year period. At minimum, the City will conduct inspections on 5% of the municipal facilities annually.

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 / Utilities Director

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.