

City of Bloomingdale, Georgia

Stormwater Management Plan

For the National Pollutant Discharge & Elimination System (NPDES)
Phase I Municipal Separate Storm Sewer System Permit 2012

Submitted to:

Environmental Protection Division Georgia Department of Natural Resources

September 20, 2015



TABLE OF CONTENTS

| Αſ | PPENDI | CES | .IV |
|----|---------|--|------|
| A | CRONYI | MS/DEFINITIONS | V |
| ΕX | (ECUTI\ | VE SUMMARY | .V |
| | SHARING | g Responsibility | V |
| | SWMP | IMPLEMENTATION RESPONSIBILITY | . VI |
| 1. | STRU | UCTURAL & SOURCE CONTROL PROGRAMS | 1 |
| | 1.1. | STRUCTURAL CONTROLS MAINTENANCE ACTIVITIES & MS4 OPERATIONS & MAINTENANCE | |
| | PROGRA | AM | 1 |
| | 1.1.1 | 1. MS4 Inventory | 1 |
| | 1.1.2 | 2. MS4 Inspections and Maintenance Program | 2 |
| | 1.2. | PLANNING PROCEDURES FOR POLLUTANT CONTROL | 4 |
| | 1.2.1 | 1. Comprehensive Plan | 5 |
| | 1.3. | Street, Road & Highway Operating Procedures | 5 |
| | 1.3.1 | 1. Street Sweeping Program | 5 |
| | 1.3.2 | 2. Roadside Ditch Maintenance | 5 |
| | 1.3.3 | 3. Deicing Procedures | 6 |
| | 1.3.4 | 4. Roadway Construction Erosion & Sedimentation Control | 6 |
| | 1.4. | FLOOD MANAGEMENT MEASURES | 6 |
| | 1.4.1 | | |
| | Asse | essment for New Projects and Retrofits | 6 |
| | 1.5. | MUNICIPAL LANDFILL & WASTE CONTROL FACILITY POLLUTANT MONITORING PROGRAMS | 7 |
| | 1.5.1 | 1. Municipal Waste Facilities | 7 |
| | _ | 2. Municipal Facilities with the Potential to Cause Pollution | |
| | 1.6. | Pesticide, Herbicide, & Fertilizer Controls | |
| | 1.6.1 | 1. Pesticide Applicator Certification Program | 8 |
| | 1.6.2 | 2. City Right-of Way Vegetation Maintenance Program | 8 |
| | 1.7. | MUNICIPAL EMPLOYEE TRAINING | 8 |
| 2. | ILLIC | CIT DISCHARGE DETECTION & ELIMINATION PROGRAMS | 9 |
| | 2.1. | Illicit Discharge Regulations | 9 |
| | 2.1.1 | 1. Illicit Discharge Regulations | 9 |
| | 2.2. | DRY WEATHER SCREENING PROGRAM FOR ILLICIT DISCHARGE DETECTION | |
| | 2.3. | INVESTIGATIVE PROCEDURES FOR SUSPECTED ILLICIT DISCHARGES | |
| | 2.4. | SPILL PREVENTION, CONTAINMENT & RESPONSE PROCEDURES | |
| | 2.4.1 | | |
| | 2.4.2 | | |
| | 2.5. | PROGRAMS TO PROMOTE, PUBLICIZE & FACILITATE PUBLIC REPORTING OF ILLICIT DISCHARGES | |
| | 251 | | 11 |

| | 2.5.2 | 2. Stormwater Management Webpage | 11 |
|----|----------------|--|------------|
| | 2.6. | PROGRAMS TO PROMOTE THE PROPER MANAGEMENT & DISPOSAL OF USED OIL & OTHER | |
| | HAZARD | DOUS SUBSTANCES | 11 |
| | 2.6.2 | 1. Recycle Rama | 11 |
| | 2.6.2 | 2. Household Hazardous Material Education Program | 12 |
| | 2.6.3 | 3. Recycling Program | 12 |
| | 2.6.4 | 4. Dry Trash Pickup | 12 |
| | 2.7. | CONTROLS LIMITING SANITARY SEWER INFILTRATION | 12 |
| | 2.7. | 1. Sanitary Sewer Inspection Program | 12 |
| | 2.8. | MUNICIPAL EMPLOYEE TRAINING | 13 |
| 3. | . WAS | STE HANDLING & INDUSTRIAL FACILITIES POLLUTION CONTROL PROGRAMS | 14 |
| | 3.1. | PRIORITIES & PROCEDURES FOR INSPECTIONS & ESTABLISHMENT OF CONTROLS | 14 |
| | 3.1. | | |
| | 3.1.2 | • | |
| | 3.2. | | |
| | 3.2. | 1. Facility Monitoring Program | 15 |
| | 3.3. | INDUSTRIAL FACILITY EDUCATION PROGRAM | |
| | 3.4. | EMPLOYEE TRAINING PROGRAM | 15 |
| 4. | . CON | NSTRUCTION SITE STRUCTURAL & NON-STRUCTURAL CONTROL PROGRAMS | 17 |
| | 4.1. | LEGAL AUTHORITY | 17 |
| | 4.2. | SITE PLANNING PROCEDURES FOR WATER QUALITY | 17 |
| | 4.2. | 1. Plan Review | 17 |
| | 4.2.2 | 2. Land Disturbance Permit | 17 |
| | 4.3. | STRUCTURAL & NON-STRUCTURAL BMP REQUIREMENTS | 18 |
| | 4.3. | 1. Structural Controls | 18 |
| | 4.3.2 | 2. Non-structural Controls | 18 |
| | 4.4. | CONSTRUCTION SITE PRIORITY IDENTIFICATION FOR INSPECTIONS | 18 |
| | 4.4. | 1. Erosion & Sedimentation Inspection Program | 18 |
| | 4.5. | CONSTRUCTION SITE OPERATOR EDUCATIONAL & TRAINING ACTIVITIES | 20 |
| | 4.5. | 1. Construction Site Operator Certification Program | 20 |
| 5. | . HIGI | HLY VISIBLE POLLUTION SOURCES (HVPS) | 21 |
| | 5.1. | HIGHLY VISIBLE POLLUTANT SOURCE / FACILITY INVENTORY | 21 |
| | 5.2. | HVP STORMWATER INSPECTION PROGRAM | 21 |
| | 5.3. | EDUCATIONAL ACTIVITIES FOR HVP SOURCES | 22 |
| | 5.4. | MUNICIPAL EMPLOYEE TRAINING PROGRAM | 22 |
| 6. | . ENF | ORCEMENT RESPONSE PLAN (ERP) | 2 3 |
| | 6.1. | ENFORCEMENT RESPONSE PLAN. | 23 |
| 7. | . IMP | AIRED WATER BODIES | 24 |
| | 7.1. | INCREASE THE FOCUS & IMPLEMENTATION OF SWMP ACTIVITIES WITHIN THE DRAINAGE BAS | SINS |
| | OF W AT | TERS LISTED ON THE ACTIVITIES 303(D) LIST | 24 |

| | 7.1.1. | Impaired Water Body Monitoring & Implementation Plan | 24 |
|----|-----------|---|----|
| | 7.1.1. | Implementation Plan to Address 303 (d) Listed Waterways | 24 |
| 8. | PUBLIC E | DUCATION & INVOLVEMENT PROGRAMS | 25 |
| | 8.1. MP0 | COUNTYWIDE STORMWATER PUBLIC EDUCATION PROGRAM | 25 |
| | 8.1.1. | MPC Natural Resources Website | 25 |
| | 8.1.2. | Waterspout E-Newsletter | 25 |
| | 8.1.3. | Stormwater Video/PSA | 26 |
| | 8.1.4. | Septic System Education Program | 26 |
| | 8.2. MP0 | COUNTYWIDE STORMWATER PUBLIC INVOLVEMENT PROGRAM | 26 |
| | 8.2.1. | Recycle-RAMA | 26 |
| | 8.2.2. | Storm Drain Marking | 26 |
| | 8.2.3. | Adopt-A-Stream | 27 |
| 9. | POST CO | NSTRUCTION | 28 |
| | 9.1. Post | Construction Runoff Control Requirements | 28 |
| | 9.1.1. | Stormwater Management Ordinance | 28 |
| | 9.1.2. | Design Criteria/Guidelines | 28 |
| | 9.1.3. | Private Structural Control Maintenance Agreement | 28 |
| | 9.2. GREI | EN INFRASTRUCTURE/LOW IMPACT DEVELOPMENT | |
| | 9.2.1. | Legal Authority and Ordinance Review | 29 |
| | 9.2.2. | GI/LID Plan | 29 |
| | | | |

APPENDICES

- 1. MS4 Inventory Map
- 2. MS4 Inventory Table
- 3. Industrial Facility Inventory
- 4. Highly Visible Pollutant (HVP) Sources Inventory

Appendix B SWMP Implementation & Standard Operating Procedures

- 1. Public Works Spill Prevention Plan
- 2. List of Staff & Equipment Available for SWMP Implementation
- 3. Pesticide/Herbicide Application SOP
- 4. Emergency Spill Contact List

Appendix C Inspection Checklists

- 1. Industrial/HVP Stormwater Inspection Checklist
- 2. Erosion & Sedimentation Inspection Checklist
- 3. MS4 Inspection Checklist
- 4. Capital Improvement Project (CIP) Water Quality Checklist
- 5. Structural Control (Pond) Inspection Checklist
- 6. Dry Weather Screening Checklist

Appendix D Ordinances & Legal Documents

- 1. Stormwater Management Ordinance
- 2. Erosion & Sedimentation Ordinance
- 3. Chatham County Drainage Agreement
- 4. MPC Contract
- 5. NPDES Phase I MS4 Permit
- Appendix E Impaired Waterway Monitoring Plan
- Appendix F Illicit Discharge Detection and Elimination Plan
- Appendix G Enforcement Response Plan
- Appendix H Green Infrastructure
 - 1. Green Infrastructure Review
 - 2. Green Infrastructure Plan

ACRONYMS/DEFINITIONS

BMPs Best Management Practices

CEMA Chatham Emergency Management Agency

CIP Capital Improvement Project

CSS Coastal Stormwater Supplement

DNR Georgia Department of Natural Resources

E&S Erosion & Sedimentation

EOC Emergency Operations Center

EPD Georgia Environmental Protection Division

ESCP Erosion & Sedimentation Control Plan

ESF Emergency Support Function

GEMA Georgia Emergency Management Agency
GESA Georgia Erosion & Sedimentation Act

GSWCC Georgia Soil & Water Conservation Commission

GWMM Georgia Stormwater Management Manual IDDE Illicit Discharge Detection & Elimination

IGP Industrial General Permit

LEPC Local Emergency Planning Committee

LDA Land Disturbing Activities
LIA Local Issuing Authority

MOU Memorandums of Understanding

MPC Chatham County – Savannah Metropolitan Planning Commission

MS4 Municipal Separate Storm Sewer System

MSDS Materials Safety Data Sheet

NOI Notice of Intent

NPDES National Pollutant Discharge & Elimination System

NRCS Natural Resources Conservation Service

QA/QC Quality Assurance/Quality Control
SIC Standard Industrial Classification
SOP Standard Operating Procedure
SWMP Stormwater Management Plan

SWP3 Stormwater Pollution Prevention Plan

UGA University of Georgia

WQPP Water Quality Protection Plan

EXECUTIVE SUMMARY

The City of Bloomingdale received renewed coverage under the National Pollutant Discharge and Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) Permit on April 12, 2012 as required by provisions of the Georgia Water Quality Control Act and the Federal Clean Water Act. This permit requires the development of a Stormwater Management Plan (SWMP), to address the following program elements, as stipulated in CFR 122.26(d)(2)(iv)(A) through 122.26(d)(2)(iv)(D):

- Structural and Source Control Measures
- Illicit Discharge Detection and Elimination
- Industrial Facility Stormwater Runoff Control
- Construction Site Runoff Management

The Georgia Environmental Protection Division (EPD) has previously required the City of Bloomingdale to expand its SWMP to include Best Management Practices (BMPs) to address the following required modifications:

- Impaired Waterways, i.e. 303(d) listed stream segments
- Highly Visible Pollutant Sources
- Public Education/Public Involvement
- Pollution Prevention/Good Housekeeping

More recently, the City of Bloomingdale has been required to comply with new requirements contained within the NPDES Phase I MS4 Stormwater Permit, issued April 12, 2012, including:

- New SWMP Formatting
- Development of an Enforcement Response Plan in 2013
- Development of a Green Infrastructure Plan in 2015
- Post Construction Stormwater Control

SHARING RESPONSIBILITY

The City of Bloomingdale works with the other NPDES Phase I MS4 Permittees within Chatham County to implement various elements of the SWMP. The City currently contracts with the Chatham County – Savannah Metropolitan Planning Commission (MPC) to perform dry weather screening, water quality monitoring and analysis, educational outreach, and preparation of the Annual Report. The City reimburses the MPC directly for these services. The City and MPC intend to continue this arrangement though the next permit period (2012 - 2017); however, should Bloomingdale elect not to continue this arrangement, the EPD will be notified and the SWMP will be revised accordingly.

In addition, the City of Bloomingdale entered into an Intergovernmental Agreement in 2008 with Chatham County to identify the responsible party for canal maintenance within the City. A table identifying the specific canals that will be maintained by the County is included in Section 1.1.1.A of this plan.

SWMP IMPLEMENTATION RESPONSIBILITY

The following table outlines the various elements of this plan, and the party(ies) responsible for implementation.

| SWMP Element | Responsible Party(ies) | | | | |
|---|---|--|--|--|--|
| 1. Structural and Source Control Measures | | | | | |
| 1.1 Structural Controls Maintenance Activities & MS4 Operations & Maintenance Program | Director of Public Works; Canal Maintenance by Chatham County, per IGA | | | | |
| 1.2 Planning Procedures for Pollutant Control | Zoning Administrator | | | | |
| 1.3 Street, Road, & Highway Operating Procedures | Director of Public Works | | | | |
| 1.4 Flood Management Measures | City Engineer | | | | |
| 1.5 Municipal Waste Control Facility Pollutant Monitoring Programs | Zoning Administrator | | | | |
| 1.6 Pesticide, Herbicide & Fertilizer Programs | Director of Public Works | | | | |
| 1.7 Municipal Employee Program | Zoning Administrator | | | | |
| 2. Illicit Discharge Detection | on & Elimination Programs | | | | |
| 2.1 Legal Authority | Zoning Administrator | | | | |
| 2.2 Dry Weather Screening Program for Illicit Discharges | MPC, Per MOU | | | | |
| 2.3 Investigative Procedures for Suspected Illicit Discharges | Zoning Administrator | | | | |
| 2.4 Spill Prevention, Containment & Response Procedures | Emergency Manager, Public Works Director | | | | |
| 2.5 Programs to Promote, Publicize & Facilitate Public Reporting of Illicit Discharges | Director of Public Works | | | | |
| 2.6 Programs to Promote the Proper Management & Disposal of Used Oil & Other Hazardous Substances | MPC, Per MOU; Director of Public Works | | | | |
| 2.7 Controls Limiting Sanitary Sewer Infiltration | Director of Water & Sewer | | | | |
| 2.8 Municipal Employee Training | City Engineer | | | | |
| 3. Waste Handling & Industrial Fa | cilities Pollution Control Programs | | | | |
| 3.1 Priorities & Procedures for Inspections & Establishment of Controls | Zoning Administrator | | | | |
| 3.2 Monitoring Program for Facility Discharge | Zoning Administrator | | | | |
| 3.3 Employee Training Program | City Engineer | | | | |
| 4. Construction Site Structural & | Non-Structural Control Programs | | | | |
| 4.1 Legal Authority | Zoning Administrator | | | | |
| 4.2 Site Planning Procedures for Water Quality | Zoning Administrator | | | | |
| 4.3 Structural & Non-Structural BMP Requirements | Zoning Administrator | | | | |
| 4.4 Construction Site Priority Identification for Inspections | Zoning Administrator | | | | |
| 4.5 Construction Site Operator Education & Training Activities | Zoning Administrator | | | | |
| 5. Highly Visible Poll | ution Sources (HVPS) | | | | |

| SWMP Element | Responsible Party(ies) | | | |
|--|------------------------|--|--|--|
| 5.1 HVPS Facility Inventory | Zoning Administrator | | | |
| 5.2 HVP Stormwater Inspection Program | Zoning Administrator | | | |
| 5.3 Educational Activities for HVPS | MPC, Per MOU | | | |
| 5.4 Municipal Employee Training Program | City Engineer | | | |
| 6. Enforcement | : Response Plan | | | |
| 6.1 Enforcement Response Plan | Zoning Administrator | | | |
| 7. Impaired | Water Bodies | | | |
| 7.1 Impaired Water Body Monitoring & Implementation Plan | City Engineer | | | |
| 8. Public Education & | Involvement Programs | | | |
| 8.1 MPC Countywide Stormwater Public Education Program | MPC, per MOU | | | |
| 8.2 MPC Countywide Public Involvement Program | MPC, per MOU | | | |
| 9. Post Construction | | | | |
| 9.1 Post-Construction Runoff Control Requirements | City Engineer | | | |
| 9.2 Green Infrastructure/Low Impact Development | Zoning Administrator | | | |

1. STRUCTURAL & SOURCE CONTROL PROGRAMS

CFR 122.26(d)(2)(iv)(A): A description of structural and source control measures to reduce pollutants from runoff from commercial and residential areas that are discharged from the municipal storm sewer system that are to be implemented during the life of the permit, accompanied with an estimate of the expected reduction of pollutant loads and a proposed schedule for implementing such controls.

1.1. STRUCTURAL CONTROLS MAINTENANCE ACTIVITIES & MS4 OPERATIONS & MAINTENANCE PROGRAM

CFR 122.26(d)(2)(iv)(A)(1): A description of maintenance activities and a maintenance schedule for structural controls to reduce pollutants (including floatables) in discharges from municipal separate storm sewers;

1.1.1. MS4 Inventory

The City's current MS4 inventory, as defined by the Extent of Service Policy is summarized below in Table 1. A map of the current GIS MS4 inventory is included in Appendix A. It is important to note that Phase I improvements of Main Street Canal have been recently been completed and Phase II is due to be completed in 2013. The City plans to integrate these improvements into the MS4 inventory during the current permit period (2012-2017). The inventory update will include:

- Field location of drainage structures
- Inspection/condition assessment of drainage structures
- As-built information as new drainage systems become dedicated to the City MS4.

Table 1: City of Bloomingdale MS4 Inventory

| Inventory Type | Number | Mileage |
|---------------------|--------|------------|
| Catch Basins/Inlets | 68 | |
| Storm Lines | | 1.6 miles |
| Ditches | | 36 miles |
| Canals* | | 11.5 miles |
| MS4 Outfalls | 24 | |
| Private Controls | 3 | |
| Municipal Controls | 0 | |

^{*} Chatham County will be responsible for maintenance and inspection of the canals per the Intergovernmental Agreement with the City of Bloomingdale included in Appendix D.

There are currently no stormwater management controls, i.e. detention ponds, retention areas, infiltration basins, stormwater wetlands, pervious pavement, and vegetated filter strips, on publicly owned property in Bloomingdale. However, in the event that Bloomingdale constructs such a structure, or acquires property with such a structure already located on it, the Public Works Department staff will inspect all such structures as outlined in section 1.1.2.B. MS4 Inspection Procedures.

1.1.1.A. Extent of Service (EOS) Policy

This EOS policy classifies the "responsibility status" of the various drainage infrastructure components within the MS4, based upon system component location and ownership factors. The City of Bloomingdale's EOS policy for the O&M program includes all drainage structures and systems within the City's public right-of-way and within municipally owned easements.

Chatham County is responsible for the operation and maintenance of 11.5 miles of canals within the City of Bloomingdale's municipal limits:

- Pipemakers Canal 3.5 miles
- Conoway Canal 2.0 miles
- Hardin Canal 4.5 miles
- Adams Branch 1.0 miles
- Main Street Canal 0.5 miles

This responsibility has been formally established through the 2008 Intergovernmental Agreement included in Appendix D.

1.1.2. MS4 Inspections and Maintenance Program

1.1.2.A. Inspection Schedule

The City of Bloomingdale's goal is to annually inspect 20% of MS4 system elements within five years of the issuance of this permit; however, such an inspection effort will require a substantial amount of staff and monetary resources. In order to allow time for the City to develop the resources necessary to be able to accomplish this ambitious inspection schedule, the City will annually "ramp up" the percentage of MS4 system elements inspected according to the schedule below:

| takes = to to y of = to the more than the takes and the takes are the ta | | | | | | |
|--|-----------|-----------|-----------|-----------|-----------|--|
| Year | 2012-2013 | 2013-2014 | 2014-2015 | 2015-2016 | 2016-2017 | |
| Percent | 10% | 15% | 20% | 20% | 20% | |
| Inspection | | | | | | |
| Catch Basins | 7 | 10 | 14 | 14 | 14 | |
| Storm Lines | 845 | 1,270 | 1,690 | 1,690 | 1,690 | |
| (feet) | | | | | | |
| Ditches (miles) | 3.6 | 5.4 | 7.2 | 7.2 | 7.2 | |
| Municipal Det. | 0 | 0 | 0 | 0 | 0 | |
| Ponds/Controls | | | | | | |

Table 2: City of Bloomingdale MS4 Inspection Schedule

1.1.2.B. MS4 Inspection Procedures

Bloomingdale will visually inspect the MS4 within the established extent of service on a routine basis.

- Inspections shall generally include a condition assessment of the various system elements including catch basins, ditches, and any future municipally owned structural controls.
- Storm drain lines will be visually inspected where they outfall into a catch basin or open drainage way, unless access is obstructed.
- The condition assessment will include a visual evaluation, where the presence and severity of the structural conditions/pollutants will be noted.
- Upon completion of an inspection, the City shall make a determination of the need for maintenance based on the results of the inspection and the maintenance criteria listed herein.
- If maintenance is required, the City shall determine if the maintenance need is structural, i.e., the structure needs to be repaired or replaced; or if the maintenance need is routine, i.e. sediment needs to be cleared, debris removed, or vegetation trimmed back.
- The City shall also make a determination if the maintenance need should be prioritized, i.e. malfunction or failure of the system is possible if the maintenance need is not addressed.
- Inspections shall be documented and records maintained by the City.

1.1.2.C. MS4 Maintenance Procedures

The City of Bloomingdale will perform maintenance of the public MS4 as specified in the Extent of Service (EOS) Policy section based upon inspection findings. During inspection, the City will determine if maintenance of the various elements are needed. The City will also prioritize maintenance needs based on their potential impact to the functionality of the public MS4. Maintenance shall be prioritized and performed in accordance with following standards:

- Sediment shall be removed before 25% of the capacity of the structure has been lost.
- Trash and debris will be removed from structures.
- Manmade and natural objects that are causing or could potentially cause a blockage to the system should be removed.
- Excess emergent vegetation will be removed.
- Bank side vegetation and vegetation in the maintenance right-of-way will be mowed or trimmed, but not removed to protect against erosion.
- Ditches not draining properly shall be re-graded to match existing pipe invert grades, to the greatest extent possible.
- All structural stormwater management practices shall be maintained such that they
 function in general accordance with their design and the standards, criteria, and
 information presented in the latest edition of the Coastal Stormwater Supplement
 and the City's Local Design Standards.
- Polluted water and debris from any line flushing will be captured and properly disposed of through the use of a jet-vac truck (or temporary detention).
- Litter, sediment, and other pollutants removed from the MS4 will also be collected and disposed of at a local landfill according to EPA guidelines.

Please note that the City has no maintenance responsibility for privately — owned stormwater control structures. If the private owner fails to maintain their structural control in accordance with any approved Maintenance Agreement with the City, then the City has the legal authority, per the Bloomingdale Code of Ordinances, to perform the necessary maintenance and recover the cost from the private owner.

1.1.2.D. Private Structural Control Inspection Procedures

Prior to the acceptance of the final plat on new ponds, the City will perform an inspection to ensure that the final construction is consistent with the developer's approved design. It is the private property owner's responsibility to ensure that their privately owned stormwater control(s) continues to function as designed.

1.2. PLANNING PROCEDURES FOR POLLUTANT CONTROL

CFR 122.26(d)(2)(iv)(A)(2): A description of planning procedures including a comprehensive master plan to develop, implement and enforce controls to reduce the discharge of pollutants from municipal separate storm sewers which receive discharges from areas of new development and significant redevelopment. Such plan shall address controls to reduce pollutants in discharges from municipal separate storm sewers after construction is completed. (Controls to reduce pollutants in discharges from municipal separate storm sewers containing construction site runoff are addressed in paragraph (d)(2)(iv)(D) of this section);

1.2.1. Comprehensive Plan

The City of Bloomingdale conducted a partial Comprehensive Plan Update in 2008 and completed a Short Term Work Program update in 2011. These updates outline goals and specific policies that are designed to protect the local quality of life. The Comprehensive Plan guides future land use and provides the framework for the Zoning Ordinance. The City of Bloomingdale is required to submit a Short Term Work Program every five years that details the actions to be taken to achieve the goals listed in the plan. The following goals and policies of the current Short Term Work Program apply directly or indirectly to issues of water quality.

<u>Policies for Natural Protection (related to Stormwater):</u>

- Continue to strengthen and fully implement erosion and sedimentation control regulations based upon State criteria.
- Continue to participate fully in the National Flood Insurance Program.
- Utilize the site plan permitting process to encourage the establishment of porous paving material where possible.
- Amend land use regulations and transportation plans as necessary to eliminate conflicts with resource protection goals.
- Update water and sewerage facilities as outlined in the City of Bloomingdale Capital Improvement Program (CIP) to encourage and support orderly growth and development.
- Review needs for expanding other public facilities and services, including protecting and providing for canopy trees, for existing and projected City growth.
- Amend PUD regulations to provide more design control and better review procedures to insure more compatible land use patterns, buffers and screening of different types of land uses.

1.3. STREET, ROAD & HIGHWAY OPERATING PROCEDURES

CFR 122.26(d)(2)(iv)(A)(3): A description of practices for operating and maintaining public streets, roads and highways and procedures for reducing the impact on receiving waters of discharges from municipal storm sewer systems, including pollutants discharged as a result of deicing activities;

1.3.1. Street Sweeping Program

To reduce polluted runoff originating from streets, roads, and highways from vehicle traffic, leaks and spills, and atmospheric deposition, the City of Bloomingdale contracts with private providers for annual street sweeping, i.e. once per year, along 3 miles of Highway 80. Debris collected by the street sweeper is disposed at a local landfill. Records of street sweeping activities will be maintained by the City and submitted in the annual report.

1.3.2. Roadside Ditch Maintenance

Roadside ditches, in the City right-of-way (ROW), are considered part of the public MS4 and are inspected and maintained twice annually by the Public Works Department to ensure effective operation. Bloomingdale currently maintains 36 miles of roadside ditches.

- Right-of-ways are mowed weekly during the growing season, and ditches are inspected at that time.
- Litter and debris is removed prior to moving and is disposed of at a local landfill.
- Community service workers pick up litter and debris when available.
- When roadside ditch inspections indicate that emergent vegetation is interfering with normal flow, excess emergent vegetation will be removed by hand or machinery to ensure proper functioning of the ditches.
- Roadside ditches are cleaned if accumulated sediment or other deposits exceed the design depth.

1.3.3. Deicing Procedures

Deicing is not often necessary in coastal Georgia, and the City of Bloomingdale does not maintain a stockpile of any material for this purpose.

1.3.4. Roadway Construction Erosion & Sedimentation Control

The Public Works Department is responsible for ensuring that all minimum measure BMPs required by the Georgia Erosion and Sedimentation Act are implemented for Bloomingdale road construction projects where appropriate, in accordance with the procedures outlined in Section 4.

1.4. FLOOD MANAGEMENT MEASURES

CFR 122.26(d)(2)(iv)(A)(4): A description of procedures to assure that flood management projects assess the impacts on the water quality of receiving water bodies and that existing structural flood control devices have been evaluated to determine if retrofitting the device to provide additional pollutant removal from storm water is feasible;

1.4.1. Flood Management Capital Improvement Project Water Quality Impact Assessment for New Projects and Retrofits

The City of Bloomingdale will operate a Capital Improvement Program to address structural flood management and drainage issues. As part of this program, the City identifies the various drainage and flooding problems within its jurisdiction and develops a proposed engineered solution to the problem in the form of a Capital Improvement Project (CIP). CIPs may include the installation of a new structure or the retrofit, upgrade, or replacement of an existing, inadequate structure.

The City of Bloomingdale, or a contracted consultant, will conduct a water quality impact assessment during the design phase of 100% of drainage and flooding related CIPs, as

funding becomes available for their implementation. This assessment will be integrated with the City's current Capital Improvement Program such that as identified CIPs are funded for implementation, an assessment will be performed during the design phase. The assessment must be completed before the design of any drainage CIP has been completed. The assessment will ensure that the drainage or flood-related CIP addresses the following:

- A description of how the proposed CIP will improve water quality.
- A description of potential water quality impacts from the proposed CIP and recommendation for mitigation of any impacts.
- The feasibility and/or cost of incorporating water quality enhancements in the CIP
- Identification of the regulatory permits needed to construction the project including, but not limited to: NPDES construction permit and a Section 404 permit.
- A statement confirming that the project adheres to the Bloomingdale design criteria, CSS, and GSMM.

This assessment for each new CIP design will become a permanent part of the CIP file, and will be provided to EPD in the Annual Report.

1.5. MUNICIPAL LANDFILL & WASTE CONTROL FACILITY POLLUTANT MONITORING PROGRAMS

CFR 122.26(d)(2)(iv)(A)(5): A description of a program to monitor pollutants in runoff from operating or closed municipal landfills or other treatment, storage or disposal facilities for municipal waste, which shall identify priorities and procedures for inspections and establishing and implementing control measures for such discharges (this program can be coordinated with the program developed under paragraph (d)(2)(iv)(C) of this section);

1.5.1. Municipal Waste Facilities

Bloomingdale does not currently own and/or operate any municipal waste facilities that are not subject to the IGP.

1.5.2. Municipal Facilities with the Potential to Cause Pollution

City staff will perform an annual stormwater site inspection for the following City facilities during this permit period.

- Public Works
- Fire Department

A City inspector will visit the site and assess the condition presence of pollutants of the following areas. The standardized Site Stormwater Inspection checklist shall be used to record the inspection results.

- Areas around machinery and/or equipment
- Areas prone to leaks and spills
- Outdoor storage and handling areas
- Waste generation, storage, treatment and disposal areas
- Vehicle wash-down areas
- Fueling areas
- Loading and unloading areas

1.6. PESTICIDE, HERBICIDE, & FERTILIZER CONTROLS

CFR 122.26(d)(2)(iv)(A)(6): A description of a program to reduce to the maximum extent practicable, pollutants in discharges from municipal separate storm sewers associated with the application of pesticides, herbicides and fertilizer which will include, as appropriate, controls such as educational activities, permits, certifications and other measures for commercial applicators and distributors, and controls for application in public right-of-ways and at municipal facilities.

1.6.1. Pesticide Applicator Certification Program

The City of Bloomingdale relies on the Georgia Department of Agriculture (DoA) to address requirements for Pesticide Applicator Training and Certification. The DoA requires commercial applicators of pesticides (herbicides and insecticides) to obtain and retain a "Commercial Pesticide Applicators License." The DoA also requires that distributors of restricted pesticides obtain and retain "Distributor Licenses." Continuing education units are required each year to maintain the license.

1.6.2. City Right-of Way Vegetation Maintenance Program

The City of Bloomingdale utilizes herbicide application on roadside ditches (less than 20 total miles) once per year. The City has developed a pesticide/herbicide use standard operating procedure (SOP) and is included in Appendix B. The City requires that the employees supervising the application of pesticide/herbicide be certified through the DoA program and that they participate in the continuing education requirements.

1.7. MUNICIPAL EMPLOYEE TRAINING

City employees will be trained during each reporting period (April 1st – March 31st) on good housekeeping and pollution prevention procedures on an annual basis. This training will include all municipal employees involved in facility operations that have the potential to cause pollution. The City shall keep records of the training including the training agenda and or materials as well as a list of attendees for inclusion in the Annual Report. This training may be held in conjunction with other required training programs described in the SWMP.

2. ILLICIT DISCHARGE DETECTION & ELIMINATION PROGRAMS

CFR 122.26(d)(2)(iv)(B): A description of a program, including a schedule, to detect and remove (or require the discharger to the municipal separate storm sewer to obtain a separate NPDES permit

2.1. ILLICIT DISCHARGE REGULATIONS

CFR 122.26(d)(2)(iv)(B)(1): A description of a program, including inspections, to implement and enforce an ordinance, orders or similar means to prevent illicit discharges to the municipal separate storm sewer system; this program description shall address all types of illicit discharges, however the following category of non-storm water discharges or flows shall be addressed where such discharges are identified by the municipality as sources of pollutants to waters of the United States: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)) to separate storm sewers, uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, and street wash water (program descriptions shall address discharges or flows from fire fighting only where such discharges or flows are identified as significant sources of pollutants to waters of the United States);

2.1.1. Illicit Discharge Regulations

The City of Bloomingdale has established adequate legal authority through its Stormwater Management Ordinance to prohibit illicit discharges and conduct an illicit discharge detection and elimination program. This ordinance prohibits illicit discharges to the public MS4, grants the City authority to enter private property to investigate suspected illicit discharges, and also provides the City with the means to enforce violations of this ordinance.

2.2. DRY WEATHER SCREENING PROGRAM FOR ILLICIT DISCHARGE DETECTION

CFR 122.26(d)(2)(iv)(B)(2): A description of procedures to conduct on-going field screening activities during the life of the permit, including areas or locations that will be evaluated by such field screens;

For a description of the City's field screening procedures and locations, please see the IDDE Plan included in Appendix F.

2.3. INVESTIGATIVE PROCEDURES FOR SUSPECTED ILLICIT DISCHARGES

CFR 122.26(d)(2)(iv)(B)(3): A description of procedures to be followed to investigate portions of the separate storm sewer system that, based on the results of the field screen, or other appropriate information, indicate a reasonable potential of containing illicit discharges or other sources of non-storm water (such procedures may include: sampling procedures for constituents such as fecal

coliform, fecal streptococcus, surfactants(MBAS), residual chlorine, fluorides and potassium; testing with fluorometric dyes; or conducting in storm sewer inspections where safety and other considerations allow. Such description shall include the location of storm sewers that have been identified for such evaluation);

For a description of the City's illicit discharge investigation and removal procedures, please see the IDDE Plan included in Appendix F.

2.4. SPILL PREVENTION, CONTAINMENT & RESPONSE PROCEDURES

CFR 122.26(d)(2)(iv)(B)(4): A description of procedures to prevent, contain, and respond to spills that may discharge into the municipal separate storm sewer;

2.4.1. Hazardous Material Spill Containment & Response Procedures

2.4.1.A. Public Works Spill Prevention and Response Plan

The City of Bloomingdale has developed and implemented spill prevention and response procedures for the Public Works Facility.

- BMPs for spill prevention
- Materials needed and available for spill response
- Party responsible for plan implementation
- Numbers of agencies to call in the event of a spill

2.4.1.B. Hazardous Material Spill Response Procedures

In the event of a hazardous material spill, CEMA is responsible for coordinating spill response between the City of Bloomingdale Police and Fire Departments, City of Savannah Fire Department HazMat, Chatham County Health Department, Local Emergency Preparedness Committee, GA EPD, US Coast Guard, and any other agency responsible for spill mitigation. CEMA operates under an Emergency Operations Plan, which addresses local government responsibilities for spill mitigation.

2.4.2. Hazardous Material Record Keeping

All departments within the City of Bloomingdale are responsible for creating and updating an inventory of all hazardous materials stored or used on all appropriate publicly owned sites. The City has a policy to not store hazardous materials on-site and only buy such material in small quantities so that it is used immediately.

2.5. PROGRAMS TO PROMOTE, PUBLICIZE & FACILITATE PUBLIC REPORTING OF ILLICIT DISCHARGES

CFR 122.26(d)(2)(iv)(B)(5): A description of a program to promote, publicize, and facilitate public reporting of the presence of illicit discharges or water quality impacts associated with discharges from municipal separate storm sewers;

2.5.1. Citizen Complaint Program

The City of Bloomingdale has established procedures for addressing citizen complaints about water quality and reports of illicit discharges/illegal dumping. City administrative staff is responsible for receiving citizen complaint calls, and the caller's information is then passed to the Public Works Department, which is responsible for taking action to address calls that relate to water quality within two business days. The Public Works staff will record actions taken to address the complaint in the work order and maintain a database of all finished work orders related to potential illicit discharges, illegal dumping, and other water quality violations. The Public Works Department maintains a database of citizen complaints and provides monthly summaries to City Council. The City shall include a summary of this database in the Annual Report.

2.5.2. Stormwater Management Webpage

The MPC administers a public education program on behalf of the City of Bloomingdale, which includes a website at www.mpcnaturalresources.org that provides information to promote, publicize and facilitate public reporting of illicit discharge. The City of Bloomingdale also provides contact information on their City website for citizens wishing to report illicit discharge or illegal dumping at http://www.bloomingdale-ga.com/Contact-Us.html.

2.6. PROGRAMS TO PROMOTE THE PROPER MANAGEMENT & DISPOSAL OF USED OIL & OTHER HAZARDOUS SUBSTANCES

CFR 122.26(d)(2)(iv)(B)(6): A description of educational activities, public information activities, and other appropriate activities to facilitate the proper management and disposal of used oil and toxic materials;

2.6.1. Recycle Rama

The MPC coordinates an annual "amnesty day" for hazardous household materials for all citizens of Chatham County including Bloomingdale. Materials accepted at this event include paint, used oil, batteries, old computers, Goodwill items, cans, glass, newspaper, etc. The event is promoted through one or more of the following methods: local television commercials, radio advertisements, local newspaper advertisements, and posters. Posters advertising this event are displayed at Bloomingdale City Hall.

2.6.2. Household Hazardous Material Education Program

The Chatham Emergency Management Agency (CEMA) provides education to residents of the City on proper procedures to follow in the event of a HazMat spill/release. Those procedures are available to the public at the following weblink: http://www.chathamemergency.org/preparedness/hazardous-materials.php. The Chatham County Local Emergency Planning Committee (LEPC) maintains an inventory of local sites that will accept waste oil, household hazardous materials and recyclables from the general public on their public education website at http://www.lepc.com/recycle.htm.

2.6.3. Recycling Program

The City of Bloomingdale offers an aluminum can recycling container at the Fire Station site and a metals recycling container at the Public Works site. The City also allows residents to recycle used motor oil at Public Works. The used oil recycling container has 110% secondary containment to prevent and spills during the recycling process. The City advertises this program via the City website and in the City's public newsletter.

2.6.4. Dry Trash Pickup

The City of Bloomingdale provides weekly curbside pickup of yard waste for residents. The yard waste is chipped for mulch by the Public Works Department, and made available for public and municipal use. This program is intended to prevent organic material from entering the MS4 and causing blockages or water quality issues.

2.7. CONTROLS LIMITING SANITARY SEWER INFILTRATION

CFR 122.26(d)(2)(iv)(B)(7): A description of controls to limit infiltration of seepage from municipal sanitary sewers to municipal separate storm sewer systems where necessary.

2.7.1. Sanitary Sewer Inspection Program

The City of Bloomingdale currently implements an inspection program to determine if the sanitary sewer system has any leaks, damage, or cross connections with the storm sewer or drainage system. Inspections of the sanitary sewer system are conducted and maintenance or capital improvements are performed, as needed. Maintenance may include repair, relining, or replacement of malfunctioning system elements. The City inspects the two active lift stations on a monthly basis, and will inspect sanitary lines or grinder pumps upon complaint, alarm, or other evidence of failure.

2.8. MUNICIPAL EMPLOYEE TRAINING

City employees will be trained each reporting period (April 1st – March 31st) on IDDE, good housekeeping and spill procedures on an annual basis. This training will include all municipal employees involved in activities that utilize potentially polluting or hazardous materials or participate in the IDDE program. The City shall keep records of the training including the training agenda and or materials as well as a list of attendees for inclusion in the Annual Report. This training may be held in conjunction with other required training programs described in the SWMP.

3. WASTE HANDLING & INDUSTRIAL FACILITIES POLLUTION CONTROL PROGRAMS

CFR 122.26(d)(2)(iv)(C): A description of a program to monitor and control pollutants in storm water discharges to municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), and industrial facilities that the municipal permit applicant determines are contributing a substantial pollutant loading to the municipal storm sewer system.

3.1. PRIORITIES & PROCEDURES FOR INSPECTIONS & ESTABLISHMENT OF CONTROLS

CFR 122.26(d)(2)(iv)(C)(1): Identify priorities and procedures for inspections and establishing and implementing control measures for such discharges;

3.1.1. Industrial Facility Inventory List

The City of Bloomingdale currently maintains an inventory of industrial facilities that discharge to the City's MS4. The list is based on EPD's NPDES IGP permittee list and is included in Appendix A. Bloomingdale will continue to modify and update this list as new facilities open or old facilities close. Bloomingdale will submit any changes to the inventory in the Annual Report. The inventory currently includes 2 facilities

3.1.2. Industrial Stormwater Inspection Program

The City of Bloomingdale will continue to be responsible for conducting stormwater inspections of industries on the inventory on an annual basis.

- Bloomingdale will check to ensure that the facility has submitted an NOI to be covered under the NPDES Industrial General Permit, if required.
- The City will perform a cursory review the general implementation status of the associated Stormwater Pollution Prevention Plan (SWP3).
- Should an inspection reveal a potential threat to water quality in the MS4, the Bloomingdale staff will notify the industry or business, provide them with a copy of the inspection checklist, and perform a re-inspection to ensure that all necessary corrections were made.
- Enforcement of any identified illicit discharges will be handled in accordance with the City's Enforcement Response Plan, to be completed in May 2013. The City of Bloomingdale will also notify the EPD if assistance is needed for enforcement or if there is a threat to Waters of the State.
- The City shall maintain records of inspections results, problems found, and actions taken. Documentation of these inspections will be submitted each year with the Annual Report. An inspection checklist is included in Appendix C.

The City will perform inspections in accordance with the schedule shown below. The actual number of inspections will be dependent on the current inventory.

| racio il city of Electricity and il alcine, independent contentant | | | | | | |
|--|-----------|-----------|-----------|-----------|-----------|--|
| | 2012-2013 | 2013-2014 | 2014-2015 | 2015-2016 | 2016-2017 | |
| % Inspected Annually | 10% | 15% | 20% | 20% | 20% | |
| Number of Facilities | 1 | 1 | 1 | 1 | 1 | |
| Inspected* | | | | | | |

Table 4: City of Bloominadale Industrial Facility Inspection Schedule

3.1.3. Industrial Facility Education Program

The City will distribute the EPD informational handout on the requirements of the NPDES Industrial General Permit to all industrial facilities during site stormwater inspections.

3.2. MONITORING PROGRAM FOR FACILITY DISCHARGE

CFR 122.26(d)(2)(iv)(C)(2): Describe a monitoring program for storm water discharges associated with the industrial facilities identified in paragraph (d)(2)(iv)(C) of this section, to be implemented during the term of the permit, including the submission of quantitative data on the following constituents: any pollutants limited in effluent guidelines subcategories, where applicable; any pollutant listed in an existing NPDES permit for a facility; oil and grease, COD, pH, BOD<INF>5</INF>, TSS, total phosphorus, total Kjeldahl nitrogen, nitrate plus nitrite nitrogen, and any information on discharges required under Sec. 122.21(g)(7) (vi) and (vii).

3.2.1. Facility Monitoring Program

In order to monitor industrial facilities discharging to the MS4, the City will continue to monitor industrial sites within the City. If evidence is found during the inspection process that on-site activities are contributing to pollution in the MS4, the site owners will be notified of the violation. Site owners/operators will be given a specific time period, proportional to the violation, in which to correct the problem. If the problem is not corrected, enforcement actions, as stipulated in the Illicit Discharge Regulations of the Stormwater Management Ordinance will be taken. If the violation is still not corrected, EPD will be notified of the problem. If EPD intervention does not ensure a resolution to the problem, the City of Garden City may elect to perform priority pollutant sampling at the facility outfall, as described in the CFR 126.26.

3.3. EMPLOYEE TRAINING PROGRAM

City employees will be trained each reporting period (April 1^{st} – March 31^{st}) on industrial facility inspection, monitoring, and education programs on an annual basis. This training will include all municipal employees involved in industrial activities. The City shall keep records

^{*}The actual number of facilities to be inspected is based upon the most recent inventory of industrial facilities.

of the training program including the training agenda and or materials as well as a list of attendees for inclusion in the Annual Report. This training may be held in conjunction with other required training programs described in the SWMP.

4. CONSTRUCTION SITE STRUCTURAL & NON-STRUCTURAL CONTROL PROGRAMS

CFR 122.26(d)(2)(iv)(D): A description of a program to implement and maintain structural and non-structural best management practices to reduce pollutants in storm water runoff from construction sites to the municipal storm sewer system.

4.1. LEGAL AUTHORITY

The City of Bloomingdale is currently a Local Issuing Authority (LIA) for LDA Permits as defined by the Georgia Erosion and Sedimentation Act (GESA), as amended in 2003. The City's Soil Erosion and Sedimentation Ordinance is compliant with the most recent amendments required by the State of Georgia. Bloomingdale administers the programs described below in accordance with the responsibilities related to being an Issuing Authority. EPD has taken the position that any program in compliance with the regulations of GESA will also be considered in compliance with those requirements of the NPDES MS4 program that related to E&S.

4.2. SITE PLANNING PROCEDURES FOR WATER QUALITY

CFR 122.26(d)(2)(iv)(D)(1): A description of procedures for site planning which incorporate consideration of potential water quality impacts;

4.2.1. Plan Review

The City's Erosion and Sedimentation (E&S) Ordinance requires submittal of approved Erosion, Sedimentation and Pollution Control Plan (ESPCP) prior to issuance of a LDA Permit. ESCPs received by Bloomingdale are forwarded to the Georgia Soil and Water Conservation District (GSWCD) who review the plans for compliance with the requirements of the GESA and the Georgia Erosion and Sedimentation Control Manual. The ESPCP must be approved by the GSWCC prior to issuance of a LDA Permit by the City.

4.2.2. Land Disturbance Permit

The City of Bloomingdale is a LIA, and remains in compliance with GESA. Accordingly, all developers are required to comply with the local E&S Ordinance and obtain a LDA Permit prior to the start of any land disturbing activities that will disturb one or more acres of land within the City limits. Phased developments that disturb a total of one acre are also required to receive a LDA Permit. The local E&S Ordinance includes a requirement that a GSWCD approved ESCP is included with the site plan. This plan must meet the requirements of GESA and Bloomingdale's E&S Ordinance, which includes the requirement to control

turbidity in the site runoff, control impacts on receiving streams, and the implementation of the minimum control measures.

4.3. STRUCTURAL & NON-STRUCTURAL BMP REQUIREMENTS

CFR 122.26(d)(2)(iv)(D)(2): A description of requirements for nonstructural and structural best management practices;

The BMPs described in the following sections include but are not limited to the requirements with which developers must comply to meet the provisions of the Georgia Erosion and Sediment Control Act. The City of Bloomingdale requires all development to comply with the provisions of the Bloomingdale E&S Ordinance and to meet the following site-specific BMP requirements. A complete list of structural and non-structural BMPs can be found in the Manual for Erosion and Sedimentation Control in Georgia. The manual is commonly referred to as the "Green Book" and is produced by the Georgia Soil and Water Conservation Commission (GSWCC).

4.3.1. Structural Controls

The structural controls required of developers are site-dependent; however the following list outlines some of the more common structural approaches recently and currently employed at local construction sites: silt fencing, inlet structure filter bags, infiltration basins, detention/retention ponds, riprap, gabions, check dams, hay bales, and graveled construction site exits. The minimum standards for structural controls are listed in the Bloomingdale E&S Ordinance.

4.3.2. Non-structural Controls

Typical non-structural controls that are required of developers currently in use include the following: 25-foot undisturbed riparian buffers, disturbed area temporary and permanent stabilization, site planning procedures, and good housekeeping. These minimum standards are also outlined in the Bloomingdale E&S Ordinance, see Appendix D.

4.4. CONSTRUCTION SITE PRIORITY IDENTIFICATION FOR INSPECTIONS

CFR 122.26(d)(2)(iv)(D)(3): A description of procedures for identifying priorities for inspecting sites and enforcing control measures which consider the nature of the construction activity, topography, and the characteristics of soils and receiving water quality;

4.4.1. Erosion & Sedimentation Inspection Program

The City operates an E&S inspection program that targets all construction projects that have a LDA Permit within the City limits. The inspections include checking all E&S control measures for compliance with the approved ESCPs and for proper management of potential

sources of pollution such as sediment, petroleum products, litter, and construction debris. If upon inspection a construction site is found to be in non-compliance with its approved E&S plan, LDA permit, and the minimum requirements of the E&S Ordinance, Bloomingdale will enforce the provisions of the E&S Ordinance.

Inspections shall be conducted before, during and after land disturbance in accordance with the following procedure:

- City staff conducts site inspections of all sites that have an LDA Permit after land disturbing activities commence to verify compliance with all applicable E&S requirements.
- Once a site is under construction is will be monitored through inspections on a regular basis until the site is stabilized. Inspections during the construction process will be prioritized as follows:
 - Significant rain event
 - Evidence of poor housekeeping
 - o History of poor compliance
 - Evidence of absent or malfunctioning controls
 - o Proximity to local waterways
- If a site shows evidence of violations during the inspection, a comprehensive site inspection will be conducted.
- If upon a comprehensive site inspection, the site is found to be in violation of the City's ordinance, the City will notify the site operator. The site operator will then have five (5) days to correct said violation.
- After five (5) days, a follow-up inspection by City representatives will take place to verify that corrective measures have been taken for previously documented deficiencies.
- A final comprehensive site inspection will be conducted at all LDA Permit sites after land disturbing activities have ceased to ensure that the site has been adequately stabilized and that all excess materials have been removed.
- An E&S Inspection Checklist will be completed during each site inspection. A log of all inspections, violations and enforcement actions will be kept by the City of Bloomingdale.
- If enforcement measures are required, they shall be implemented as follows:
 - For the first and second violations the City will issue a written warning to the violator. The violator shall have five (5) days to correct the violation. If the violation is not corrected within five (5) days, the City will issue a Stop Work Order.
 - For a third and each subsequent violation, the City will issues an immediate
 Stop Work Order; and

o All Stop Work Orders shall be effective immediately upon issuance and shall be in effect until the necessary corrective action or mitigation has occurred.

4.5. CONSTRUCTION SITE OPERATOR EDUCATIONAL & TRAINING ACTIVITIES

CFR 122.26(d)(2)(iv)(D)(4): A description of appropriate educational and training measures for construction site operators.

4.5.1. Construction Site Operator Certification Program

GESA now requires all local government employees involved with plan review, site inspections, or E&S Ordinance enforcement, as well as construction site operators to undergo the applicable training seminars developed by the GSWCC. The City requires all construction site operators to provide evidence in their LDA Permit application that they have received the appropriate certification. Evidence of site personnel certification must also be produced during an E&S inspection. The City also requires all applicable staff to receive this training as soon as possible after the start of their employment.

5. HIGHLY VISIBLE POLLUTION SOURCES (HVPS)

5.1. HVPS FACILITY INVENTORY

The City of Bloomingdale maintains an inventory of commercial businesses and facilities that are considered to be highly visible sources of pollutants (HVPS). The City considers the following types of businesses to be HVPS:

- Auto Repair/Maintenance Facilities
- Gas Stations
- Landscape and Garden Related Businesses
- Pest Control Companies
- Car Washes
- Vet Offices/Kennels

The current inventory is included in Appendix A and is updated annually based on changes to the business license database. This inventory currently includes 19 facilities.

5.2. HVPS STORMWATER INSPECTION PROGRAM

The City will be responsible for conducting stormwater inspections onsite at facilities on the HVPS inventory list in accordance with the schedule below.

| Table 5: | City of Bloom | ningdale HVP | Inspection | Schedule |
|----------|---------------|--------------|------------|----------|
| | | | | |

| | 2012-2013 | 2013-2014 | 2014-2015 | 2015-2016 | 2016-2017 |
|---------------------------------------|-----------|-----------|-----------|-----------|-----------|
| % HVPS Facilities Inspected Annually* | 10% | 15% | 20% | 20% | 20% |
| Number of Facilities Inspected* | 2 | 3 | 4 | 4 | 4 |

^{*}The actual number of facilities to be inspected is based upon the most recent inventory of HVPs.

- The standardized Site Stormwater Inspection Checklist shall be used to record the inspection results.
- A database shall be maintained on all inspections, problems found, and actions taken.
- If a violation of the Stormwater Ordinance is identified, City staff will notify the industry or business, provide them with a copy of the inspection checklist, and perform a re-inspection (if necessary) to ensure that any mandatory corrections are made.
- Enforcement procedures will be conducted in accordance with the City's Enforcement Response Plan, due to be completed in May 2013.

• Documentation of these inspections will be submitted each year with the Annual Report.

5.3. EDUCATIONAL ACTIVITIES FOR HVPS SOURCES

Each year the MPC will facilitate an educational event/campaign for one selected type of HVPS.

- The HVPS to be addressed during this permit may include:
 - Auto Repair/Maintenance Facilities
 - Gas Stations
 - o Landscape and Garden Related Businesses
 - Pest Control Companies
 - o Car Washes
 - o Vet Offices/Kennels
- The events will be designed to provide the businesses/industries with the information necessary to prevent stormwater pollution on-site.
- The MPC will organize the event, including educational materials, speakers, demonstrations, etc.
- The City will assist the MPC with promotion of the event to the appropriate HVPS sources within Bloomingdale.
- A summary of the event and any educational materials developed will be included in the annual report.

5.4. MUNICIPAL EMPLOYEE TRAINING PROGRAM

City employees will be trained each reporting period (April 1^{st} – March 31^{st}) on HVPS facility inspection and education programs on an annual basis. This training will include all municipal employees involved in HVPS activities. The City shall keep records of the training program including the training agenda and or materials as well as a list of attendees for inclusion in the Annual Report. This training may be held in conjunction with other required training programs described in the SWMP.

6. ENFORCEMENT RESPONSE PLAN (ERP)

6.1. ENFORCEMENT RESPONSE PLAN

The City of Bloomingdale will develop and implement an ERP, which will include the ordinances providing legal authority, types of enforcement mechanisms available, escalation of enforcement, time frames for investigation, and the method to be used to track instances of non-compliance. The ERP will be developed by May 15, 2013 and submitted to EPD in the 2012 – 2013 Annual Report for their approval.

7. IMPAIRED WATER BODIES

7.1. INCREASE THE FOCUS & IMPLEMENTATION OF SWMP ACTIVITIES WITHIN THE DRAINAGE BASINS OF WATERS LISTED ON THE ACTIVITIES 303(D) LIST

Waterways in the City of Bloomingdale that appear on the 2010 303(d) list for not meeting the standards of their designated use include the Little Ogeechee River. The current listing is summarized in the table below. This segment does not have an approved TMDL.

Table 6: 303(d) Listed Waterways within the City of Bloomingdale

| Waterway | Segment | Criterion Violated | Potential Cause | TMDL |
|-----------------------|---|-----------------------|--------------------|------|
| Little Ogeechee River | Ogeechee Run to Little Ogeechee Pond | DO | Urban Runoff | No |

7.1.1. Impaired Water Body Monitoring & Implementation Plan

The City has developed a plan to perform water quality monitoring of the impaired water bodies listed above. This plan is included in Appendix E.

7.1.1. Implementation Plan to Address 303 (d) Listed Waterways

The Impaired Water Body Monitoring & Implementation Plan includes a number of BMPs designed to address the impaired waterways within the City of Bloomingdale. While only certain waterways in Bloomingdale are listed as impaired, these BMPs will be implemented throughout the entire unincorporated area.

8. Public Education & Involvement Programs

8.1. MPC COUNTYWIDE STORMWATER PUBLIC EDUCATION PROGRAM

The City of Bloomingdale has an MOU with MPC, included in Appendix D, to implement a stormwater education program on behalf of the City. Should this contract not be renewed for any reason, the City of Bloomingdale shall be responsible for implementation of the educational programs (or their equivalent) as listed below.

8.1.1. MPC Natural Resources Website

The MPC will continue to maintain a website devoted to educating the public about water resource issues including stormwater pollution impacts and prevention. The web address is www.mpcnaturalresources.org. This site contains a wealth of information on various stormwater topics including:

- Erosion & Sedimentation Control / How to Conserve Natural Resources on Construction Sites Manual
- Green Infrastructure Practices / Coastal Stormwater Supplement
- Proper Disposal of Household Hazardous Waste
- Education on Illegal Dumping
- Contact Number(s) to Report Water Quality Violations
- Proper Application, Storage and Disposal of Landscape Chemicals
- Tips on How to Prevent Stormwater Pollution
- Waterspout E-Newsletter Issues
- Stormwater Videos / PSAs
- Educational Presentations on Stormwater Issues

The MPC will review the information and resources included on the website on an annual basis and make changes as appropriate.

8.1.2. Waterspout E-Newsletter

The MPC will continue to produce a quarterly e-newsletter dealing with water resource issues and advertising local educational and outreach opportunities and events. Topics that will be addressed within the newsletter include: proper disposal of household hazardous waste; contact number(s) for citizens to report water quality violations; proper application, storage, and disposal of landscape chemicals; impacts of stormwater pollution and tips for stormwater pollution prevention. MPC will email this newsletter to their list serve which will includes City staff and elected officials as well as local school representatives, and will make it available on the website for easy public access. Copies of the newsletters will be included in the annual report.

8.1.3. Stormwater Video/PSA

The MPC has created an educational video to educate the public about stormwater issues including flooding, runoff, pollution prevention, etc. This video and other videos about stormwater water issues will be played on Chatham County and City of Savannah Public Access channels which are regularly viewed by local residents. This video is also available on the MPC website. It has also been distributed free of charge by the MPC to all schools & universities within Chatham County for their use in the classroom. The MPC will ensure that the video is aired on the County government public access channel at least once a year and will report the date of all airings in the annual report.

8.1.4. Septic System Education Program

The MPC has purchased a display and brochures from the UGA Cooperative Extension Service for the purpose of septic system education. This display will be exhibited by MPC at outreach events, including the Earth Day Festival. The MPC will exhibit the display and brochures during at least one public event every year and will report on this in the annual report.

8.2. MPC COUNTYWIDE STORMWATER PUBLIC INVOLVEMENT PROGRAM

Bloomingdale has a MOU with MPC, included in Appendix D to implement a stormwater public involvement program on behalf of the City. Should this contract not be renewed for any reason, Bloomingdale shall be responsible for implementation of the educational programs (or their equivalent) as listed below.

8.2.1. Recycle-RAMA

The MPC will work with the L.E.P.C. to coordinate an annual "amnesty day" for the proper disposal and/or recycling of hazardous household materials. Materials accepted at this event will generally include paint, used oil, batteries, electronics, Goodwill items, etc. MPC will promote this event through one or more of the following methods: local television commercials, radio advertisements, local newspaper advertisements, and posters. Posters advertising this event are hung at Bloomingdale City Hall.

8.2.2. Storm Drain Marking

The MPC coordinates the Storm Drain Marking program where storm drains are marked with Duracast tiles containing the message, "No Dumping – Drains to Waterway." In neighborhoods where drains are marked, a door hanger is placed on the front doors of houses to educate residents about the impacts of illegal dumping. This public information tool describes the program, provides tips to the public on steps they can take to prevent stormwater pollution, and lists the MPC Complaint Contact Number for any questions or water quality violations. The MPC will provide the tiles, glue, and informational brochures to

local volunteer groups or City staff who will be marking tiles. MPC will advertize this program opportunity on their website, and will work with the City to mark new/unmarked catch basins within the municipal jurisdiction. When new development (with curb and gutter) occurs in Bloomingdale, the City will work with MPC to place new storm drain tiles on the inlets during one marking event per year. The number of inlets marked will be reported on in the annual report.

8.2.3. Adopt-A-Stream

The MPC will continue to serve as the Chatham County contact for the Adopt-A-Stream program and will work to promote this volunteer monitoring program as well as Adopt-A-Wetland. MPC has information about both programs, as well as contact information for citizens interested in participating. MPC will advertise the training events for this BMP at least once a year via email, website or newsletter and will report on this in the annual report. When funding is available, the MPC will continue to purchase monitoring kits and provide them to volunteer groups who adopt a local water body.

9. Post Construction

9.1. POST-CONSTRUCTION RUNOFF CONTROL REQUIREMENTS

9.1.1. Stormwater Management Ordinance

The Stormwater Management Ordinance contains provisions prohibiting illicit discharges and illegal dumping, requiring post-construction stormwater management, granting the City the authority to enter private property to conduct inspections, and establishing procedures for violations and enforcements.

The City of Bloomingdale Stormwater Management Ordinance references the design guidelines recommended by the Coastal Stormwater Supplement (CSS) to the Georgia Stormwater Management Manual (GSMM). Under this ordinance, and the referenced CSS design standards, developers must comply with the rules and regulations governing the development of post-development stormwater management plans for new development and redevelopment. The regulations require developers to submit a Stormwater Management Site Plan for all developments disturbing more than 1.0 acre of land or adding more than 5,000 sqft of impervious surface. Stormwater management plans must address water quality and water quantity issues in accordance with CSS recommendations. This ordinance encourages site design that incorporates green infrastructure and infiltration of stormwater to reduce stormwater runoff rates and volume. The Stormwater Management Site Plan must be reviewed by a Georgia-certified Professional Engineer and approved by the City before a Land Disturbing Activity (LDA) Permit is issued and construction can begin.

9.1.2. Design Criteria/Guidelines

The City has adopted, by reference in the Stormwater Ordinance, the CSS and the GSMM, which include design criteria/guidelines to assist developers in designing a site plan that will manage post-construction runoff quality and quantity as required by the NPDES Phase I Permit. The CSS was created to offer BMP recommendations specific to coastal drainage conditions including high water tables, large tidal ranges and unique terrestrial habitats of coastal Georgia. This manual expands post-construction stormwater management efforts to include prevention, as opposed to just mitigation, of the negative impacts of the land development process. The City provides guidance, through adoption of this manual on an integrated green infrastructure based approach to natural resource protection, stormwater management, and site design.

9.1.3. Private Structural Control Maintenance Agreement

The City of Bloomingdale adopted a Stormwater Management Ordinance that requires private owners to maintain their structural controls. Maintenance includes clearing the debris screen and any other inlet and outlet structures, removing trash and sediment from

the pond, and re-grading the sides if possible. Material removed must be separated, mulched, landfilled, and/or incinerated as appropriate. Upgrading and structural maintenance on inlet and outlet structures may also be performed as needed.

Maintenance for private structural controls is the responsibility of the property owner Further details on the required maintenance of private controls are located in the Stormwater Management Ordinance in Appendix D.

9.2. GREEN INFRASTRUCTURE/LOW IMPACT DEVELOPMENT

9.2.1. Legal Authority and Ordinance Review

The City of Bloomingdale has performed an assessment of its existing codes to determine if there are any obstacles to smart growth and green infrastructure approaches to stormwater management. The City utilized the checklist developed by the Center for Watershed Protection to perform this assessment. The completed checklist and summary of recommended actions were included in the 2012 Annual Report, and are also included in Appendix H. Based on the results of the assessment; the City may need to perform an update to the City Code to remove the obstacles identified. The City will complete any zoning code updates by April 2014.

9.2.2. GI/LID Plan

The City of Bloomingdale will develop and implement a GI/LID Plan to address the following items:

- 1. GI/LID techniques and practices
- 2. GI/LID Structure Inventory
- 3. GI/LID Inspection Program

The GI/LID Plan will be completed by May 2015, and submitted for EPD approval in the Annual Report. Implementation of the plan will begin during permit year 2015 – 2016, and will be reported upon annually beginning in May 2016. A copy of the GI/LID Plan will be included in Appendix H, upon completion and approval by EPD.