



City of Port Wentworth, Georgia

Stormwater Management Program

National Pollutant Discharge & Elimination System (NPDES)

Phase I Medium Municipal Separate Storm Sewer System (MS4) Permit 2017

Submitted to:

Environmental Protection Division
Georgia Department of Natural Resources

October 2017

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Appendix A MS4 Permit and Notice of Intent (NOI)

Appendix B Legal Documents & Ordinances

- 1) Memorandum of Agreement for Canal Maintenance
- 2) Stormwater Management Ordinance (including Illicit Discharge Prohibition & Post Construction Stormwater Controls)
- 3) Soil Erosion, Sedimentation, and Pollution Control (E&S) Ordinance

Appendix C Maps & Inventories

- 1) MS4 Control Structure Inventory
- 2) MS4 Control Structure Map

Appendix D Inspection Checklists and Procedures

- 1) Capital Improvement Program (CIP) Assessment Checklist
- 2) Stormwater Site Inspection Checklist (HVPS, Municipal, & Industrial sites)
- 3) MS4 Inventory Inspection Procedures

Appendix E Illicit Discharge Detection and Elimination Plan (including Outfall Map, Outfall Inventory, and identification of “wet” outfalls)

Appendix F Enforcement Response Plan

Appendix G Green Infrastructure Plan

ACRONYMS/DEFINITIONS

BMPs	Best Management Practices
CIP	Capital Improvement Project
CSS	Coastal Stormwater Supplement
DoA	Georgia Department of Agriculture
E&S	Erosion & Sedimentation
EOS	Extent of Service
EPD	Georgia Environmental Protection Division
ESPCP	Erosion & Sedimentation Control Plan
GCB	Chatham Clean and Beautiful
GCDWR	Chatham County Department of Water Resources
GESA	Georgia Erosion & Sedimentation Act
GI/LID	Green Infrastructure/Low Impact Development
GIS	Geographic Information System
GSMM	Georgia Stormwater Management Manual
GSWCC	Georgia Soil & Water Conservation Commission
HazMat	Hazardous Materials
HVPS	Highly Visible Pollution Source
IDDE	Illicit Discharge Detection and Elimination
IGP	Industrial General Permit
LDA	Land Disturbing Activities
LEED	Leadership in Energy and Environmental Design
LIA	Local Issuing Authority
LID	Low Impact Development
MOA	Memorandum of Agreement
MS4	Municipal Separate Storm Sewer System
MSDS	Materials Safety Data Sheet
MSWP	Master Stormwater Plan
NPDES	National Pollutant Discharge & Elimination System
NRCS	Natural Resources Conservation Service
O&M	Operations and Maintenance
ROW	Right-of-Way
SQAP	Sampling Quality Assurance Plan
SWMP	Stormwater Management Program
SWP3	Stormwater Pollution Prevention Plan

EXECUTIVE SUMMARY

The City of Port Wentworth received coverage under the National Pollutant Discharge and Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) Permit (GAS000210) on April 12, 2017, as required by provisions of the Georgia Water Quality Control Act and the Federal Clean Water Act. A copy of the permit and Notice of Intent (NOI) is included in Appendix A. 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 also required the City of Port Wentworth to expand its SWMP to include Best Management Practices (BMPs) to address the following required modifications:

- Highly Visible Pollutant Sources
- Enforcement Response Plan
- Impaired Waters Monitoring and Implementation
- Municipal Employee Training
- Public Education
- Public Involvement
- Post Construction
- Green Infrastructure

The stormwater management program described within this document demonstrates the commitment of the City of Port Wentworth to water resources protection.

SWMP IMPLEMENTATION RESPONSIBILITY

Stormwater responsibilities and implementation of this Plan are overseen by the City of Port Wentworth's Public Services Department. Public Services staff work in conjunction with other City staff members, when necessary, to ensure implementation of this plan.

The City of Port Wentworth shares responsibility for BMP permit implementation with one other entity – Chatham County. Chatham County performs some canal maintenance in Port Wentworth in accordance with its Memorandum of Agreement (MOA), which is included in Appendix B.

1. STRUCTURAL & SOURCE CONTROL MEASURES

Permit Section 3.3.1: Structural and Source Control Measures, Table 3.3.1

1.1. MS4 CONTROL STRUCTURE INVENTORY AND MAP

1.1.1. Description

The City of Port Wentworth's MS4 is made up of the structures and facilities that are used for collecting, conveying, storing and/or treating stormwater from the source drainage area to the point of final outlet. The City's NPDES Phase I Medium MS4 Permit defines the MS4 as follows:

"Municipal Separate Storm Sewer System or an MS4 means a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains, owned or operated by a municipality or other public body, designed or used for collecting or conveying storm water runoff and is not a combined sewer or part of a Publicly Owned Treatment Works."

The City of Port Wentworth has completed a Geographic Information System (GIS) inventory and map of the MS4. The MS4 inventory and map is included in Appendix C. The City will continue to maintain and update this inventory on an annual basis. This will be accomplished through review of new development as-built maps as well as field inspections.

1.1.2. Measurable Goals:

- Maintain and update a map of MS4 control structures.
- Maintain and update an inventory of MS4 control structures.

1.1.3. Schedule

- Annual, 2017 – 2022: Provide inventory and map and update if needed.

1.1.4. Items to be included in Annual Report:

- Updated inventory and map of the MS4.
- Number of MS4 structures added during the reporting period and the total number of structures in the inventory.

1.2. MS4 INSPECTION AND MAINTENANCE PROGRAM

1.2.1. Description

The City of Port Wentworth has adopted a five (5) zone approach to inspections and maintenance of the MS4 that allows for these activities to address 100% of the MS4 over five (5) years. The City has divided the MS4 into five (5) operational zones to balance the MS4 structures across each zone. The City will perform inspections of the MS4 structures within one zone per year, rotating the zones each year, to ensure that 100% of the structures will be inspected within the five-year permit term. The five zones are described below, and a map illustrating these zones is included in Appendix C.

- Zone 1: This area covers the area east of Highway 21 north of Jeffers Road and the northern portion of I-95 to the Chatham County boundary (including the Rice Hope Plantation Subdivision).
- Zone 2: This area includes the areas along Highway 21 from I-95 north to Jeffers Road and Old Georgia Highway 21 (including the Rice Creek Subdivision).
- Zone 3: This area primarily includes the Lakeshore area along Meinhard Road, the northern half of Newport, and the large undeveloped area in the southwest portion of Port Wentworth.
- Zone 4: This area includes the southern portion of Newport; the City's Wastewater Treatment facility; industrial facilities; and the northern portion of the City's downtown area.
- Zone 5: This area includes the southern parts of Port Wentworth, including industrial facilities along Grange Range and the southern portion of the City's downtown area.

The City will visually inspect the MS4 within each maintenance zone in accordance with the following procedures:

- Inspections will generally include a condition assessment of the various system elements including, but not limited to, catch basins, storm drain lines, ditches, and stormwater controls (i.e. detention/retention ponds).
- Storm drain lines will be visually inspected where they outfall into a structure or open drainage way, unless access is restricted due to obstructions.
- The condition assessment will include a visual evaluation of the structure that addresses structural condition and maintenance need. The following conditions will be noted and indicate that a structure needs maintenance:

Table 1: MS4 Maintenance Criteria

Structure	Standard for Maintenance
Catch Basins	Sediment fills up to the lowest invert
Ditches	50% filled with sediment
Pipes	50% filled with sediment
Detention Ponds	50% filled with sediment

Inspections will be documented through a field collection application that is downloaded on an electronic device, such as a Tablet, and will be recorded within the City’s GIS layer.

Upon completion of an inspection, the City will determine if maintenance is needed based on inspection results and the City’s maintenance criteria. The City will prioritize maintenance needs based on their potential impact to the functionality of the public MS4. Maintenance shall be prioritized and performed in general accordance with the following standards:

- The City will schedule appropriate maintenance as needed and in accordance with available City resources.
- The City will respond to all citizen complaints related to MS4 structures, and will perform maintenance as needed.
- All stormwater management structures will 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 (CSS) and Georgia Stormwater Management Manual (GSMM).
- Sediment will be removed before 50% 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 will 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 that are not draining properly will be re-graded to match existing pipe invert grades, to the extent possible.
- Materials removed from the MS4 during maintenance will be properly disposed of by the City or a contractor hired by the City.
- Maintenance activities for MS4 structures are documented through the use of an electronic Work Order database maintained by the City.

Chatham County will inspect and maintain the following major canals within the City of Port Wentworth in accordance with the procedures outlined in the MOA, included in Appendix B. The specific canals and mileage to be maintained is shown in Table 2 below:

Table 2: Chatham County Canal Maintenance

Canal Name	Mileage
Phillips Avenue	0.43
Little Hurst	1.14
Oxnard	0.14
Pumpkin Bridge	0.2
Appleby	0.14

1.2.2. Measurable Goals

- Conduct inspections of the MS4 structures within one maintenance zone per year so that 100% of the structures are inspected within the five-year period.
- Conduct maintenance on MS4 structures as needed.

1.2.3. Schedule

MS4 Inspections

- March 2018 – Complete Inspection Area Zone 1
- March 2019 – Complete Inspection Area Zone 2
- March 2020 – Complete Inspection Area Zone 3
- March 2021 – Complete Inspection Area Zone 4
- March 2022 – Complete Inspection Area Zone 5

MS4 Maintenance

- Ongoing, 2017 -2022: As needed, based on inspections.

1.2.4. Items to be included in Annual Report:

- Number/length and percentage of total structures inspected and maintained during the reporting period.
- Table of individual inspection reports with a record for each structure inspected, and the findings of that inspection.
- Summary of Work Orders created and completed related to MS4 structures maintenance.

1.3. PLANNING PROCEDURES

1.3.1. Description

1.3.1.A. Comprehensive Plan

The Port Wentworth Comprehensive Plan outlines goals and specific policies that are designed to protect and enhance the local quality of life. The Comprehensive Plan guides future land use and provides the framework for the Zoning Ordinance. The City updated the Comprehensive Plan in 2016 to meet planning goals through the year 2036. The Plan can be viewed at the following weblink: <http://cityofportwentworth.com/page/svc.planningdev>

The following goals and community policies of the City's Comprehensive Plan related to natural resources protection, development patterns, and community facilities and infrastructure impact the City's stormwater program and envision a "green infrastructure" approach to stormwater management.

Vision: "Through appropriate land use planning, development regulations, progressive public policy and partnerships, and sustainable community development, Port Wentworth will continue to grow as a family-oriented city with housing options for all ages, a variety of commercial businesses, excellent public facilities and services, exceptional recreational opportunities, a safe and welcoming pedestrian environment, and a focus on preserving natural and cultural resources."

Community Policies:

- Encourage new development to set aside greenspace or create parks to support community health.
- Protect and preserve natural and cultural resources in the community.
- Encourage preservation of land and the incorporation of greenspace into new developments.
- Discourage development within designated flood zones.
- Encourage land use that reduces stormwater runoff volume and pollution.
- Continue to invest in the City's infrastructure systems to ensure that they continue to function.
- Support Implementation of the City's Stormwater Master Plan and capital Improvement Program.
- Comply with the City's Water, Wastewater and Stormwater permits.

Implementation of these policies will help guide and direct development and re-development in the City of Port Wentworth and ultimately help reduce pollutants in the MS4.

1.3.1.B. Citywide Stormwater Master Plan

In 2016, the City finalized the Port Wentworth Citywide Stormwater Master Plan. The Master Plan provides the City with a comprehensive document that evaluates stormwater deficiencies within City limits and proposes potential stormwater improvement projects to assist in alleviating potential flooding.

A copy of this Plan may be obtained by contacting the City of Port Wentworth City Hall.

1.3.2. Measurable Goals

- Review and update, as needed, the Comprehensive Plan and the Citywide Stormwater Master Plan.

1.3.3. Schedule

- Annual, 2017 – 2022: Review planning procedures.

1.3.4. Items to be included in the Annual Report

- Description of any changes made to the Comprehensive Plan or Citywide Stormwater Master Plan during the reporting period.

1.4. STREET MAINTENANCE

1.4.1. Description

1.4.1.A. Street Sweeping and Litter Pickup

The City of Port Wentworth provides street sweeping, primarily in the downtown district in the Fall months, to reduce polluted runoff originating from streets with curb and gutter systems and public parking lots. Street sweeping may also be performed during other months on an as-needed basis. The street sweeper is also used to clean after heavy storms and for street and parking lot cleanup after special events .

The City also manually collects litter and debris from road shoulders as part of the City's routine street cleaning and maintenance activities and removes litter and debris on an as-needed/customer complaint basis throughout the City if there is an illegal dumping issue.

Litter and debris collected from street sweeping and maintenance and cleanup-up activities is disposed of at a local landfill.

1.4.1.B. Roadside Ditch Maintenance

Roadside ditches that are located within the City Right-of-Way (ROW) are considered part of the public MS4 and are inspected and maintained by the Public Services Department to ensure effective operation. The City of Port Wentworth currently maintains approximately 21 miles of roadside ditches.

Ditches will be inspected as part of the City's proactive "MS4 Inspection and Maintenance Program," described in Section 1.2 and ditch maintenance will be conducted as needed based on the inspection results and the City's maintenance criteria.

The City also mows roadside ditches located within the City ROW at least quarterly during the growing season and inspections are conducted at that time as well. Litter and debris are removed by the City crews prior to mowing the ROW and are disposed of at a local landfill. 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. The City maintains a log to document mowing activities and litter and debris removal.

1.4.1.C. De-icing Procedures

De-icing is not often necessary in coastal Georgia, and the City of Port Wentworth does not maintain a stockpile of any material for this purpose.

1.4.1.D. Roadway Repair/Roadway Construction Erosion & Sedimentation Control

The Department of Public Services is responsible for ensuring that all minimum measure BMPs required by the Georgia Erosion and Sedimentation Act are implemented for City of Port Wentworth road construction projects where appropriate.

The City contracts with a third-party vendor for street repair such as pothole repair, asphalt patching, and road re-grading.

1.4.2. Measurable Goals:

- Conduct street sweeping activities for streets with curb and gutters with a minimum of at least 50,000 feet of streets swept during the reporting period.
- Conduct roadside ditch maintenance and shoulder street maintenance on an as-needed basis through mowing and litter removal activities.
- Ensure minimum measure BMPs are implemented as part of City road repair/construction projects.

1.4.3. Schedule

- Ongoing: 2017 – 2022: Conduct street sweeping, roadside ditch maintenance and shoulder street maintenance/ensure minimum measure BMPs are implemented

1.4.4. Items to be included in Annual Report

- Documentation of street sweeping activities, including length of streets swept.
- Documentation of trash and debris removal activities including amount of trash and debris removed from the ROW during roadside ditch maintenance and street shoulder activities.

1.5. FLOOD MANAGEMENT PROJECTS

1.5.1. Description

1.5.1.A. Flood Management Capital Improvement Project Water Quality Impact Assessment for New Structures

The City of Port Wentworth currently requires developers to comply with the City's Stormwater Management Ordinance, which detail the rules and regulations governing post-development stormwater management practices for new development and redevelopment. The regulations require developers to submit a stormwater site plan for all developments that are not specifically exempted within the ordinance. Site stormwater management plans must address water quality and water quantity issues in accordance with the requirements of the NPDES Phase I MS4 Permit, the CSS, and applicable local development regulations.

The stormwater site plan is reviewed by a Georgia-registered Professional Engineer (contracted or City staff) and approved by Development Services before a land disturbing activities (LDA) Permit is issued and construction can begin.

1.5.1.B. Flood Management Capital Improvement Project Water Quality Impact Evaluation for Existing Structures

The City of Port Wentworth operates a Capital Improvement Program to address structural flood management and drainage issues within public systems within the ROW. As part of this program, the City identifies the various drainage and flooding problems within the City 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 Port Wentworth, or a contracted consultant, will conduct a water quality impact assessment during the design phase for 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 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 construct the project including, but not limited to, an NPDES construction permit and a Section 404 permit.
- A statement stating that the project adheres to the City's design criteria and CSS.

The City will use the CIP Stormwater Impact Assessment checklist to perform the assessment, a copy of which is included in Appendix D. The assessment for each CIP design will become a permanent part of the CIP file, and will be provided to EPD in the Annual Report.

The City finalized the Port Wentworth Citywide Stormwater Master Plan in 2016. The Master Plan provides the City with a comprehensive document that evaluates stormwater deficiencies within City limits and proposes potential stormwater improvement projects to assist in alleviating potential flooding, including a list of CIPs.

1.5.2. Measurable Goal:

- Ensure new flood management projects are assessed for water quality impacts in accordance with the City's Stormwater Management Ordinance.
- Evaluate existing flood control devices as part of the City's Capital Improvement Program to determine if retrofitting the devices for additional pollutant removal is feasible.

1.5.3. Schedule

- Annual, 2017 – 2022: Ensure all new Flood Management Projects are assessed for water quality impacts.
- Annual, 2017 – 2022: Review all existing flood management facilities that are retrofitted through the City's CIP program during the reporting period.

1.5.4. Items to be included in the Annual Report

- Number of plans that included new flood management projects that were reviewed during the reporting period.
- Summary of all water quality assessments of existing flood management control structures that occurred during the reporting period.

1.6. MUNICIPAL FACILITIES

1.6.1. Description

This program element addresses municipally-owned facilities with the potential to cause pollution, which will be referred to collectively as “Municipal Facilities”, that are not subject to the Georgia EPD’s regulations for Industrial Facilities (see Section 3.3.3 of the Permit for additional information). The City has inventoried its municipal facilities and determined that as of the date of this Plan, the City’s Public Services building is currently the only municipal facility that has the potential to cause pollution that is subject to regulation as a Municipal Facility. The City operates a Wastewater Treatment Plant which is subject to the EPD’s Industrial Stormwater Permitting requirements (Section 3.3.3), for which the City has submitted an Industrial No Exposure Exclusion Certification form. Additional information about Industrial Facilities is listed in Section 3 of this SWMP.

City staff will inspect municipal facilities with the potential to discharge pollutants to the MS4; and all municipal facilities sites will be inspected at least once every 5 years (with at least 5% of the municipal facilities inspected annually). The Stormwater Site Inspection Checklist, found in Appendix D, will be used to document municipal site inspections and records will be maintained on problems found and actions taken. If sites are found to need improvements, the appropriate department will be notified of the problem. City staff will then perform a re-inspection after the stipulated timeframe or request follow up documentation, if deemed necessary, to ensure that proper action has been taken.

1.6.2. Measurable Goals

- Update the municipal facilities inventory annually (if needed), and include with the annual report.
- Annually inspect the municipal facilities such that 100% of all the facilities listed on the municipal facility inventory are inspected every 5 years (with at least 5% of the municipal facilities inspected annually).
- Document site inspections using the Stormwater Site Inspection Checklist provided in Appendix D.

1.6.3. Schedule

- 2017 – 2022, Inspect 100% of municipal facilities, with at least 5% of the municipal facilities inspected annually.

1.6.4. Items to be included in the Annual Report

- Copy of the completed inspection checklist for each municipal facility.
- Summary of corrective actions conducted to address issues found during inspection.

1.7. PESTICIDE, HERBICIDE, & FERTILIZER APPLICATION

1.7.1. Description

1.7.1.A. Pesticide Applicator Certification Program

The City of Port Wentworth relies on the Georgia Department of Agriculture (DoA) to address requirements for Pesticide Applicator Training and Certification. The DoA requires commercial applicators of restricted use pesticides (including herbicides, insecticides, fungicides, plant growth regulators, and defoliant) to obtain and retain a “Commercial Pesticide Applicators License.” The DoA also requires that distributors of restricted pesticides obtain and retain “a Pesticide Dealer’s License. Continuing education units are required each year to maintain the license.

Prior to issuing a business license, the City of Port Wentworth will require applicants who are likely to require a commercial pesticide applicators license to provide proof that they hold the appropriate State license.

1.7.1.B. Pesticide, Herbicide, & Fertilizer Application Program

No pesticides, fertilizers, or herbicides are used by City staff to maintain the City of Port Wentworth roadside ditches, canals, and right-of-ways. All vegetation maintenance is performed manually or mechanically.

The City of Port Wentworth does utilize minimal amounts of pesticides and herbicides in the maintenance of City grounds in preparation for the City’s Annual Stand Up for America Day. These chemicals are purchased at a local landscaping company that is open to the public. City employees are not required to obtain a commercial pesticide applicator license for the use of these chemicals because they are not regulated as restricted use pesticides.

A Standard Operating Procedure (SOP) has been prepared to guide City workers when applying pesticides, herbicides, and fertilizers. This SOP consists of operational best management practices (BMPs) developed to minimize or prevent the discharge of chemicals into the City’s stormwater drainage system by promoting proper storage and application of chemicals during landscape maintenance activities. These procedures are critical steps that must be included in every landscape maintenance activity that includes chemical application to either control weeds and pests or to provide adequate fertilization.

The City’s SOP for pesticide, herbicide, and fertilizer application is as follows:

1. Conduct chemical application only during days when it is not windy or raining, and when rain is not predicted in the immediate forecast.

2. Consult the Material Safety Data Sheet (MSDS), if available, or package directions for each chemical to ensure all storage, handling, and application precautions are taken.
3. Follow label directions when storing, handling, mixing, recycling and disposing of chemicals and empty container; properly calibrate application equipment, if applicable, to ensure proper amount of chemicals are applied.
4. DO NOT transfer, pour or dispose of chemicals outdoors, near or in storm drains, or drainage areas; transfer over impervious surface so spills can't seep into ground.
5. Have spill cleanup materials available and ready to go in case of spill; clean up chemical spills promptly, with DRY methods, if possible.
6. When watering landscaped area after fertilizer application, take care to not allow water to runoff into streets or other conduits to the waterways.
7. Recycle or dispose of all spent or excess chemicals properly and promptly.
8. Keep all pesticide and herbicide chemicals in leak proof shelters away from elements to help prevent contamination of the stormwater system.
9. Keep unused containers closed tightly; use a tight fitting lid; label containers.
10. The City will comply with the GDoA Program, as needed and appropriate, with regards to training and certification of staff. A Commercial Pesticide Applicator License may be required for City employees that apply restricted use pesticides (i.e., pesticides that are not available to the general public).

1.7.2. Measurable Goals:

- Continue to utilize GDoA Program to certify commercial applicators and distributors within the City.
- Continue to adhere to the Pesticide, Fertilizer, and Herbicide Chemical Application SOP above when performing any landscape chemical application within the City.

1.7.3. Schedule:

- Ongoing, 2017-2022: Continue to require GDoA Program Certification for commercial applicators and distributors within the City.
- Ongoing, 2017-2022: Continue to abide by the SOP.

1.7.4. Items to be Included in the Annual Report:

- Documentation of any program activities conducted during the reporting period related to the chemical application of herbicides, pesticides, or fertilizers.

2. ILLICIT DISCHARGE DETECTION & ELIMINATION (IDDE)

Permit Section 3.3.2: Illicit Discharge Detection and Elimination Program (IDDE), Table 3.3.2

2.1. LEGAL AUTHORITY

2.1.1. Description

The City of Port Wentworth has established adequate legal authority through Chapter 7, Article III, Division 2 of the City's Stormwater Management Ordinance to prohibit illicit discharges and conduct an illicit discharge detection and elimination program. This ordinance, which was last updated in October 2009, prohibits illicit discharges to the public MS4, grants the City the authority to enter private property to investigate suspected illicit discharges, and also provides the City with the means to enforce violations of this ordinance. The ordinance is included in Appendix B.

2.1.2. Measurable Goal

- Evaluate the Illicit Discharge Prohibition Ordinance annually to determine if revisions are required.

2.1.3. Schedule

- Annual, 2017 - 2022: Annual review of Illicit Discharge Prohibition Ordinance

2.1.4. Items to be included in the Annual Report

- Copy of Illicit Discharge Prohibition Ordinance if revised during the reporting period

2.2. OUTFALL INVENTORY & MAP

2.2.1. Description

The City of Port Wentworth Island has developed an outfall inventory and a map showing the location of all outfalls from the MS4 and the names and location of all waters of the State that receive discharges from those outfalls. In addition, the City has identified those outfalls that are continuously “wet” due to tidal activity or surcharge of the system, and those that are dry. A “wet” designation means that the invert of the outfall is below the mean high tide or static water level causing the drainage system to be flooded daily.

To view the map and inventory of the MS4 Outfalls, please see the Illicit Discharge Detection and Elimination (IDDE) Plan included in Appendix E. Each year, the City will update the map and inventory to reflect the addition of outfalls from new infrastructure projects or developments and remove any outfalls that have been reclassified or removed.

2.2.2. Measurable Goals

- Maintain and update a map showing the location of all outfalls from the MS4, which outfalls are “wet”, and the names and location of all waters of the State that receive discharges from those outfalls.
- Maintain and update a database inventory of all outfalls from the MS4 within the City limits of Port Wentworth.

2.2.3. Schedule

- Annual, 2017-2022: Update MS4 Outfall Map and Inventory

2.2.4. Items to be included in the Annual Report

- Updated inventory and map of the MS4 outfalls that identifies which MS4 outfalls are “wet”, with the names and locations of all waters of the State that receive discharges from those outfalls.

2.3. IDDE PLAN

2.3.1. Description

The City of Port Wentworth's IDDE Plan consists of inspecting MS4 outfalls to determine if upstream facilities/connections are discharging non-stormwater flows to the drainage system and eliminating all identified illicit discharges. The IDDE Plan is included in Appendix E.

The City will perform inspections and/or dry weather screening of the MS4 outfalls within its current inventory in accordance with the procedures outlined in the IDDE Plan. The City will investigate any potential illicit discharges in accordance with the procedures in the IDDE Plan. Suspect or obvious illicit discharges require follow-up actions and activities, as specified in the IDDE Plan to determine the specific source(s) of contamination. Should the City positively identify any illicit discharges, the City will perform enforcement actions as dictated by the Illicit Discharge Ordinance, the IDDE Plan, and the City's Enforcement Response Plan (ERP) to remove positively identified illicit discharges. A copy of the City's ERP is included in Appendix F.

2.3.2. Measurable Goals

- Conduct and document dry weather screening of 100% of all MS4 outfalls over a five-year period (minimum of 5% of outfalls annually).
- Investigate and perform source tracing for 100% of suspected illicit discharges.
- Enforce the Illicit Discharge Ordinance, IDDE, and ERP for 100% of positively identified illicit discharges.

2.3.3. Schedule

- Annual, 2017 – 2022: Inspect MS4 Outfalls
- Ongoing, 2017 – 2022: Perform source tracing
- Ongoing 2017 – 2022: Enforce Illicit Discharge Ordinance

2.3.4. Items to be Included in the Annual Report

- Number of MS4 outfalls inspected during the reporting period.
- Map and completed dry weather screening forms (Outfall Reconnaissance Inventory Form) for all MS4 Outfalls screened within the reporting period.
- Records of any source tracing or enforcement activities conducted as a result of dry weather screening activities.

2.4. SPILL RESPONSE PROCEDURES

2.4.1. Description

The City's Public Services Department maintains spill response materials onsite to respond to and cleanup minor chemical spills at municipal facilities, and checks for spill kits when conducting inspections of Highly Visible Pollutant Source (HVPS) facilities and Industrial facilities. Public Service workers are also responsible for reporting and clean up of sanitary sewer spills.

The Port Wentworth Fire Department assumes the lead role in managing any hazardous materials spill incident within the City of Port Wentworth. The Fire Department is responsible for coordinating spill response efforts through the regional hazmat response team and other local, regional, and State entities responsible for spill mitigation. A Standard Operation Procedure Manual has been developed as guidance to ensure the Fire Department adheres to proper spill response procedures. Calls regarding chemical spills are logged and the Fire Department documents spill response activities. The Fire Department is responsible for ensuring its staff receive specialized spill response training, if needed. Fire Department staff receive generalized training within 30 days of being hired and additional training may be provided as needed, depending on job responsibilities.

2.4.2. Measurable Goal

- Maintain documentation on any spill occurrences and cleanup performed through the City's Work Order database and/or City of Port Wentworth Fire Department records.

2.4.3. Schedule

- Annual 2017 - 2022: Maintain documentation of any spills and cleanup activities.

2.4.4. Items to be included in the Annual Report

- Documentation on any spill occurrences and cleanup performed.

2.5. PUBLIC REPORTING PROCEDURES

2.5.1. Description

The City of Port Wentworth has established procedures for addressing citizen complaints about water quality and reports of illicit discharges and illegal dumping. The City maintains a link on the City's official website that allows citizens and visitors to report concerns, including illicit discharges and illegal dumping, and to submit work order requests. Concerns reported through the City's website are entered into the City's Work Order Database and referred to the appropriate department for follow-up as needed. The link to this page can be found on the City's webpage at <http://cityofportwentworth.com/page/servicerequest>.

The City has also developed a Stormwater web page that provides a phone number to report stormwater pollution (912-966-7427) for residents to contact the City for any purpose including a request for service and/or to report illicit discharges to the storm sewer system. City administrative staff are responsible for receiving citizen complaint calls, and using the caller's information to generate a Work Order. The Work Order is then passed to the Public Services Department, which is responsible for taking action to address calls that relate to water quality within two business days. The Public Services staff will record actions taken to address the complaint in the work order and return it to City Hall for filing.

The City's Administrative Department maintains a database of all finished work orders related to potential illicit discharges, illegal dumping, and other water quality violations. Enforcement of City Code, when necessary, is referred to the City's Code Enforcement department, who will enforce the ordinances in accordance with the City's ERP, which is included in Appendix E.

2.5.2. Measurable Goals

- Promote, publicize and facilitate public reporting of illicit discharges through the City's website.
- Investigate and take appropriate action for 100% of all IDDE/water quality related complaints received.
- Record IDDE/water quality-related complaints and actions taken in the City's Work Order Database.

2.5.3. Schedule

- Ongoing, 2017 – 2022: Take action for/document complaints received, as appropriate.
- Annual, 2017 – 2022: Update website with promotional and educational information.

2.5.4. Items to be included in the Annual Report

- Summary of the citizen complaints received, including documentation of complaints, investigations, and actions taken during the reporting period.

2.6. PROPER MANAGEMENT & DISPOSAL OF USED OIL & TOXIC MATERIALS

2.6.1. Description

2.6.1.A. Hazardous Material Public Education

The City of Port Wentworth maintains an inventory of commercial businesses and facilities that are considered to be HVPSs as well as industrial sites. HVPSs and industrial facilities are routinely inspected by the City, and industry-specific educational literature, including literature about proper waste management and disposal, is supplied at the time of the site inspection or as part of the follow-up to the site inspection on an “as-needed” basis.

Citizens are provided with a copy of the City’s Water/Sewer Sanitation Policies Procedure booklet when they become a new resident and annually thereafter. This booklet contains information about waste disposal and recycling procedures for residences and commercial entities. The City of Port Wentworth maintains a webpage that is accessible to City employees, commercial entities, and the general public. Educational information related to proper waste management and disposal is featured on this website, which may be accessed at <http://cityofportwentworth.com/page/dept.publicserv.sani>. This webpage also includes a link to the Chatham County Resource Conservation Education Center website, which lists information to help citizens of the County, including those in the City of Port Wentworth, to dispose of hazardous household waste properly. The website includes a listing of facilities and businesses that will recycle items such as fluorescent lamps, flammable liquids and paint, tires and other wastes from the general public. The link to the Chatham County Resources Conservation Education is as follows:

<http://recycling.chathamcounty.org/Recycling-Drop-Off/Hard-to-Recycle-Materials>

Additional information about the City’s Public Education and Involvement Programs, which includes relevant stormwater-related information including proper waste management and disposal, are discussed in Sections 9 and 10 of this Plan.

2.6.1.B. Recycling and Waste Management Program

The City of Port Wentworth contracts with a third-party vendor to offer a curbside, “all-in-one” residential recycling program and residential and commercial garbage collection. In addition, the vendor collects bulky items (appliances, furniture, etc.) and yard wastes/land debris for disposal from local residents. Information about these programs is maintained on the City’s website at <http://cityofportwentworth.com/page/dept.publicserv.sani>.

2.6.2. Measurable Goals:

- Promote proper management and disposal of used oil and toxic materials by maintaining a City webpage link to the Chatham County Resource Conservation Education Center website.
- Provide industry-specific educational literature, including literature about proper waste management and disposal, during HVPS and Industrial Site inspections on an “as-needed” basis.
- Operate a residential curbside recycling program

2.6.3. Schedule

- Ongoing, 2017 – 2022: Maintain link to Chatham County Resource Education website on City’s stormwater webpage.
- Ongoing, 2017 – 2022: Provide industry-specific educational literature, including literature about proper waste management and disposal, during HVPS and Industrial Site inspections on an “as-needed” basis.
- Ongoing, 2017 – 2022: Operate curbside residential recycling program

2.6.4. Items to be included in the Annual Report

- Details of any activities performed during the reporting period including web link for the Chatham County Resource Conservation Education Center, and an estimate of recyclables collected.

2.7. SANITARY SEWER INFILTRATION CONTROLS

2.7.1. Description

The City of Port Wentworth implements an inflow and infiltration (I&I) 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 based on the inspections. Maintenance may include repair, relining, or replacement of malfunctioning system elements. City staff also conduct daily (weekday) visual inspections of its lift stations to ensure they are operating correctly. Citizen complaints regarding the sewer system are inspected immediately. As part of its I&I program, all sewer lines were slip lined, repaired or replaced within the past several years, so the City's sanitary sewer collection system is relatively new

2.7.2. Measurable Goal:

- Perform daily (weekday) inspections of lift stations .
- Inspect 100% of suspected sewage spills from the sanitary sewer system reported to or by the City of Port Wentworth.
- Resolve 100% sanitary sewer overflows or cross connections.
- Record and maintain information on all sanitary sewer spills in the Work Order Database.

2.7.3. Schedule

- Ongoing, 2017 – 2022: Investigate and address suspected sewer overflows or discharges.

2.7.4. Items to be Included in the Annual Report

- Details on activities performed during the reporting period as recorded in the City's Work Order database.

3. INDUSTRIAL FACILITY STORMWATER DISCHARGE CONTROL

Permit Section 3.3.3: Industrial Facility Stormwater Discharge Control, Table 3.3.3

3.1. INDUSTRIAL FACILITY INVENTORY

3.1.1. Description

The City of Port Wentworth currently maintains an inventory of industrial facilities that discharge to the City's MS4. This list is based on the EPD's Industrial Storm Water General Permit (IGP), Notice of Intent (NOI) and No Exposure Exclusion (NEE) online listings. The City of Port Wentworth will continue to modify and update this list in accordance with the informational sources listed above for inclusion in the City's Annual Report.

3.1.2. Measurable Goals

- Annual update of Industrial Facility Inventory.

3.1.3. Schedule

- Annual, 2017 – 2022: Update Industrial Facility Inventory.

3.1.4. Items to be Included in the Annual Report

- Updated Industrial Facility Inventory.

3.2. INDUSTRIAL STORMWATER INSPECTION PROGRAM

The City of Port Wentworth will conduct onsite stormwater inspections for 100% facilities on the industrial inventory list over the course of the five (5) year permit period (2017 – 2022.) with a minimum of at least 5% of the industrial facilities inspected each year. The following procedures will be followed:

- City staff will first determine whether the industrial facility discharges to the City MS4. If the facility does not discharge to the City MS4, it shall be removed from the Industrial Facility Inventory.
- City staff will check to ensure that the facility has submitted a NOI to be covered under the NPDES IGP, if it is required.
- City staff will perform a cursory review of the implementation status of the facility's associated Stormwater Pollution Prevention Plan (SWP3).
- The City will perform an inspection of the facility and document the inspection, and recommended corrective actions, utilizing the Stormwater Site Inspection Checklist that is included in Appendix D. If facility personnel are present during the site inspection, a copy of the inspection checklist will be left with facility personnel. Educational literature, including literature about proper waste management and disposal and other relevant topics, may also be supplied at the time of the site inspection or as part of the follow-up to the site inspection on an "as-needed" basis.
- Should an inspection reveal a potential threat to water quality in the MS4, City staff will notify the industry or business and provide them with a copy of the inspection checklist. The City may request follow-up documentation and/or perform a re-inspection to ensure that all necessary corrections were made if deemed necessary.
- Enforcement of any identified illicit discharges will be handled in accordance with the City's Illicit Discharge Ordinance, IDDE, and ERP.
- If the violation is still not corrected, the EPD will be notified of the problem. The City will also notify the EPD if assistance is needed for enforcement of the NPDES IGP or if there is a threat to Waters of the State. If EPD intervention does not ensure a resolution to the problem, the City of Port Wentworth may elect to perform water quality monitoring at the facility outfall. In addition, the City may, during the investigation of a violation of the City's IDDE Ordinance, complete or require monitoring of a suspected industrial facility, in order to secure evidence to support the alleged violation.
- The City will maintain records of inspections results, problems found, and actions taken.

The City of Port Wentworth operates a wastewater treatment plant that is listed on EPD's Industrial Stormwater NPDES-permitted facilities. However, the City submitted the Industrial No Exposure Exclusion (NEE) Certification form and is therefore exempt from the IGP as long as the condition of No Exposure is maintained. The City conducts inspections to ensure that

a condition of No Exposure is maintained at the facility. Results of these inspections are maintained at the City's wastewater treatment plant.

3.2.1. Measurable Goals

- Inspect 100% of industrial facilities in the City's inventory over the 5-year permit period, and inspect at least 5% of the industrial facilities in the inventory annually.
- Document site inspections and recommended corrective actions/violations using the Site Inspection Checklist.
- Enforce the Illicit Discharge Ordinance, IDDE, and ERP as needed.

3.2.2. Schedule

- Annual, 2017 – 2022: Inspect 100% of industrial facilities in the City's inventory over the 5-year permit period and at least 5% of industrial facilities annually.

3.2.3. Items to be Included in the Annual Report

- Copy of completed inspection checklist for each industrial facility inspected during the reporting period and any available follow-up documentation
- Number and percentage of facilities inspected.
- Water quality monitoring results, if monitoring is conducted.

3.3. ENFORCEMENT PROCEDURES

3.3.1. Description

If upon inspection, an industrial site is found to have issues that would be considered an illicit discharge, then the City will take enforcement action(s) as outlined in the City's Illicit Discharge Ordinance and ERP and in Section 3.2 and Section 6 of this Plan and documents the actions. If an illicit discharge has not taken place but practices onsite indicate a high probability that such a discharge could occur, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection. The City will also make the operator aware of Volume 3 of the Georgia Stormwater Management Manual that discusses pollution prevention and good housekeeping.

3.3.2. Measurable Goals:

- Implement enforcement procedures when violations are discovered during inspections of industrial facilities.
- Document enforcement actions taken in violation/enforcement action log.

3.3.3. Schedule

- Ongoing, 2017 – 2022: Document enforcement actions.

3.3.4. Items to be Included in Annual Report

- Documentation of enforcement action taken during the reporting period.

3.4. EDUCATIONAL ACTIVITIES

3.4.1. Description

The City will distribute the EPD information about the requirements of the NPDES IGP and/or other relevant stormwater best practices educational information to industrial facilities during site inspections on an as-needed basis. Relevant information for Industrial facilities will also be included on the facility's stormwater webpage.

Additional information about the City's Public Education and Public Involvement Programs, including measurable goals and practices the City will use to educate industrial facilities, HVPSSs, and citizens about property stormwater management practices, is discussed in Sections 9 and 10 of this Plan.

3.4.2. Measurable Goals

- Provide educational information, including EPD brochures and/or other relevant stormwater best practices educational information, to facilities listed on the City's Industrial Facility Inventory during inspections on an as-needed basis.
- Maintain educational material relevant to Industrial facilities on City website.

3.4.3. Schedule

- Ongoing, 2017 – 2022: Maintain educational materials on website.
- Annual, 2017 – 2022: Provide education information to industrial facilities during inspections.

3.4.4. Items to be included in the Annual Report

- Summary of educational information distributed to industrial facilities and/or a copy of the educational literature.
- Web link for educational materials.

4. CONSTRUCTION SITE MANAGEMENT

Permit Section 3.3.4: Construction Site Management, Table 3.3.4

4.1. LEGAL AUTHORITY

The City of Port Wentworth has adopted the most current model Soil Erosion, Sedimentation, and Pollution Control Ordinance (E&S Ordinance), as written and distributed by EPD (Chapter 7, Article IV). This ordinance is included in Appendix B. This ordinance meets the requirements of the NPDES Phase I MS4 Medium Permit and the requirements of the Georgia Erosion and Sedimentation Act (GESA).

The City of Port Wentworth is currently not a Local Issuing Authority (LIA) for LDA Permits as defined by GESA. The EPD has determined that those local governments that do not have issuing authority for LDA Permits are not required to implement requirements of 122.26(d)(2)(iv)(D) that require construction site structural and non-structural programs. In these locations, EPD is responsible for regulating, permitting, and enforcing State law for land disturbing activities. If Port Wentworth does regain the LIA status, programs will be added to the SWMP to address the following requirements:

- Site Plan Review Procedures
- Construction Site Inspection Program
- Construction Site Enforcement Procedures
- Construction Site Certification / Operator Educational and Training Activities

4.1.1. Measurable Goals

- Annually evaluate the E&S Ordinance to determine if revisions are required.

4.1.2. Schedule

- Annual, 2017 – 2022: Annual Review of E&S Ordinance

4.1.3. Items to be Included in the Annual Report

- Copy of the updated ordinance if revisions are made during the reporting period.

5. HIGHLY VISIBLE POLLUTANT SOURCES (HVPS)

Permit Section 3.3.5: Highly Visible Pollutant Sources, Table 3.3.5

5.1. HVPS FACILITY INVENTORY

5.1.1. Description

The City maintains an inventory of commercial businesses and facilities that are considered to be highly visible pollutant sources (HVPS). Based on the types of facilities and the results of HVPS inspections conducted over the past permit cycle, the City now considers the following types of businesses to be HVPS:

- Auto Repair / Maintenance Facilities
- Gas Stations
- Landscape and Garden Related Businesses
- Pest Control Companies (that operate a commercial store)
- Car Washes
- Vet Offices / Kennels

The inventory is updated annually based on changes to the business license database and/or field inspections, and will be included in each annual report.

5.1.2. Measurable Goals

- Update the HVPS Inventory on an annual basis.

5.1.3. Schedule

- Annual, 2017 – 2022: Update HVPS Inventory

5.1.4. Items to be Included in Annual Report

- Updated HVPS Inventory

5.2. HVPS STORMWATER INSPECTION PROGRAM

The City will be responsible for conducting stormwater inspections onsite at facilities on the HVPS inventory list such that 100% of facilities are inspected over the permit period (2017 – 2022), with a minimum of 5% of the facilities inspected annually. Inspections shall be scheduled annually with approximately 20% of inspections occurring each year to meet the requirement of 100% of facilities inspected over the 5-year permit period.

A City inspector, or a qualified authority designated by the City, will visit the HVPS site and assess the condition and presence of pollutants onsite in the following areas:

- 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

The following procedures will be followed during HVPS inspections and as follow-up to the inspections:

- The City will perform an inspection of the facility and document the inspection, and recommended corrective actions, utilizing the Stormwater Site Inspection Checklist that is included in Appendix D. If facility personnel are present during the site inspection, a copy of the inspection checklist will be left with facility personnel. Educational literature, including literature about proper waste management and disposal and other relevant topics, may also be supplied at the time of the site inspection or as part of the follow-up to the site inspection on an “as-needed” basis.
- Should an inspection reveal a potential threat to water quality in the MS4, City staff will notify the industry or business and provide them with a copy of the inspection checklist. The City may request follow-up documentation and/or perform a re-inspection to ensure that all necessary corrections were made if deemed necessary.
- Enforcement of any identified illicit discharges will be handled in accordance with the City’s Illicit Discharge Ordinance, IDDE, and ERP.
- If the violation is still not corrected, the EPD will be notified of the problem. The City will also notify the EPD if assistance is needed for enforcement or if there is a threat to Waters of the State. If EPD intervention does not ensure a resolution to the problem, the City of Port Wentworth may elect to perform water quality monitoring at the facility outfall. In addition, the City may, during the investigation of a violation of the City’s IDDE Ordinance, complete or require monitoring of a suspected HVPS, in order to secure evidence to support the alleged violation.
- The City will maintain records of inspections results, problems found, and actions taken.

5.2.1. Measurable Goals

- Inspect 100% of HVPS facilities in the City's inventory over the 5-year permit period, and inspect at least 5% of the HVS facilities in the inventory annually.
- Document site inspections and recommended corrective actions/violations using the Site Inspection Checklist.
- Enforce the Illicit Discharge Ordinance, IDDE, and ERP as needed.

5.2.2. Schedule

- Annual, 2017 – 2022: Inspect 100% of HVPS facilities in the City's inventory over the 5-year permit period and at least 5% of industrial facilities annually.

5.2.3. Items to be Included in the Annual Report

- Copy of completed inspection checklist for each HVPS facility inspected during the reporting period and any available follow-up documentation
- Number and percentage of facilities inspected.
- Water quality monitoring results, if monitoring is conducted.

5.3. ENFORCEMENT PROCEDURES

5.3.1. Description

If upon inspection, an HVPS site is found to have issues that would be considered an illicit discharge, then the City will proceed to an enforcement action as outlined in the IDDE, Illicit Discharge Ordinance, ERP and in Section 5.1 and Section 6 of this Plan. If an illicit discharge has not taken place but practices onsite indicate a high probability that such a discharge could occur, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection. Generally, the City will attempt to notify property owners / operators within 10 business days of the initial inspection, if not sooner, if issues are discovered. Re-inspections will be performed on an as-needed basis during the reporting year to determine if corrective actions have been taken.

5.3.2. Measurable Goal(s)

- Implement enforcement procedures for violations noted during HVPS inspections.
- Document enforcement actions taken in violation/enforcement action log

5.3.3. Schedule

- Ongoing, 2017 – 2022: Take enforcement actions, as needed and appropriate.

5.3.4. Items to be included in Annual Report

- Documentation of enforcement actions taken on HVPS sites during the reporting period.

5.4. EDUCATIONAL ACTIVITIES

5.4.1. Description

The City will distribute EPD information about stormwater best practices and related educational information to HVPSs during site inspections on an as-needed basis. Relevant information for HVPS facilities will also be included on the facility's stormwater webpage.

Additional information about the City's Public Education and Public Involvement Programs, including measurable goals and practices the City will use to educate industrial facilities, HVPSs, and citizens about property stormwater management practices, is discussed in Sections 9 and 10 of this Plan.

5.4.2. Measurable Goals

- Provide educational information, including EPG brochures and/or other relevant stormwater best practices educational information, to facilities during inspections on an as-needed basis.
- Maintain educational material relevant to HVPS on City website.

5.4.3. Schedule

- Ongoing, 2017 – 2022: Maintain educational materials on website.
- Annual, 2017 – 2022: Distribute educational materials during HVPS inspections.

5.4.4. Items to be included in the Annual Report

- Summary of educational information distributed to HVPS facilities and/or a copy of the educational literature.
- Web link for HVPS educational materials.

6. ENFORCEMENT RESPONSE PLAN (ERP)

Permit Section 3.3.6: Enforcement Response Plan (ERP)

6.1. ERP IMPLEMENTATION

6.1.1. Description

The City of Port Wentworth has developed and will continue to implement the City's ERP, which includes 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, included in Appendix F, was approved by EPD during the former permit cycle. The City will review the ERP annually and revise as necessary. If the ERP is revised, the City will submit it to EPD for review.

6.1.2. Measurable Goal(s)

- Review the ERP annually.

6.1.3. Schedule

- Ongoing, 2017 – 2022: Take enforcement actions, as needed and appropriate
- Annual, 2017 – 2022: Update ERP, if necessary.

6.1.4. Items to be included in Annual Report

- The revised ERP, if updates were completed during the reporting period.

7. MONITORING FOR DISCHARGES TO IMPAIRED WATER BODIES

Permit Section 3.3.7: Impaired Waterbodies

At this time, the 303(d) list of coastal streams shows that there are no impaired waterways located within the jurisdictional boundary of Port Wentworth, therefore no Impaired Waterbody Monitoring and Implementation Plan is required.

8. MUNICIPAL EMPLOYEE TRAINING

Permit Section 3.3.8: Employee Municipal Training

8.1.1. Description

The City of Port Wentworth will conduct annual employee training for those employees who work in any municipal facility or function that has the potential to contribute pollutants to the MS4. Alternatively, the City may send employees to an applicable training course. City employees will be trained during each permit period on stormwater topics that are necessary for that employee to do their job, including such topics as good housekeeping, IDDE, industrial and HVPs inspections, E&S inspections, Green Infrastructure/Low Impact Development (GI/LID) and/or pollution prevention procedures. The City will keep records of the training including the training agenda and/or materials, training date(s), as well as a list of attendees.

8.1.2. Measurable Goals

- Ensure that appropriate City staff obtain the appropriate stormwater education and training.

8.1.3. Schedule

- Annually, 2017 – 2022: Conduct/attend employee training.

8.1.4. Items to be included in the Annual Report

- Summary of training conducted or attended during the reporting period. This may include agendas and/or training materials, date(s) of training, and a list of attendees.

9. PUBLIC EDUCATION

Permit Section 3.3.9: Public Education

9.1. STORMWATER WEBPAGE

9.1.1. Description

The City of Port Wentworth will continue to maintain a Stormwater webpage on the City's official website that is linked to the home page and contains information on stormwater management issues. The link to this page can be found on the City's home page at <http://cityofportwentworth.com>. The City's stormwater webpage address is: <http://cityofportwentworth.com/page/dept.publicserv.storm>

This website will be used to promote the City's and other local educational programs, and include information on such topics as stormwater runoff; proper stormwater management practices and how to prevent stormwater pollution; and a telephone number to report illegal dumping, illicit discharges and other stormwater problems. The City also maintains a tab on its main webpage that allows citizens and visitors to report concerns, including illicit discharges and illegal dumping, and to submit work order requests.

Webpage updates will be conducted annually. Updates may include educational information about innovative design methodologies, including low impact development, green infrastructure and LEED for New Construction Sustainable Sites as more of this information becomes available. Information specific to HVPSs and Industrial Facilities and electronic versions of brochures and videos may be included.

9.1.2. Measurable Goals

- Maintain and update website to include applicable and relevant educational materials.
- Promotes this webpage as a part of other public education initiatives when feasible.

9.1.3. Schedule

- Annual, 2017 – 2022: Review and update website educational material as necessary.

9.1.4. Items to be Included in Annual Report

- Link to educational information on City's webpage

9.2. PUBLIC INFORMATION BROCHURES

Permit Section 3.3.9: Public Education

9.2.1. Description

The City will distribute brochures, or equivalent educational information, about stormwater pollution prevention at City Hall and during educational outreach events. City staff may also hand out relevant stormwater-related educational literature when conducting property site inspections (such as HVPS and Industrial Site Inspections) or visiting residences. Citizens are also provided with a copy of the City's Water/Sewer Sanitation Policies Procedure booklet when they become a new resident and annually thereafter.

Brochures will be reviewed on an annual basis and new brochures may be chosen and distributed. Brochures will be restocked as needed. If available, electronic versions of the brochures may be posted on the website.

9.2.2. Measurable Goals

- Distribute educational brochures at City Hall and/or during outreach events, site inspections, etc.
- Review brochures on an annual basis and update as needed.
- Restock brochures as needed.

9.2.3. Schedule

- Annual, 2017 – 2022: Distribute, review brochures and restock brochure distribution points.

9.2.4. Items to be included in Annual Report

- A summary of and/or copy of brochures distributed during the reporting period.
- Description of event(s) where brochures were distributed

9.3. UTILITY BILL STUFFER/HEADER

In order to reach the widest audience possible, the City will include educational information on stormwater issues in the public utility bills for all of its customers. The City may opt to include a utility bill stuffer or to put an educational message in the utility bill header. Messages may include advertising the City's Stormwater Webpage, encouraging citizens to report illicit discharges and illegal dumping, or providing tips to prevent stormwater pollution, including litter reduction, proper waste management and disposal practices, etc.

9.3.1. Measurable Goals

- Include educational information related to stormwater issues in public utility bill (utility bill stuffer or header)

9.3.2. Schedule

- Annual, 2017 – 2022: Include utility bill stuffer or header

9.3.3. Items to be included in Annual Report

- Date that the utility bill stuffer/header was distributed
- Copy of the utility bill stuffer/header

10. PUBLIC INVOLVEMENT

Permit Section 3.3.10: Public Involvement

10.1. PUBLIC INPUT ON SWMP

10.1.1. Description

The City of Port Wentworth will invite the public to provide input on the SWMP by posting this document as well as the City's MS4 Annual Report on the Stormwater Webpage on the City's website. The webpage will contain a link that will allow the public to submit comments to the City on the best management practices included within the SWMP as well as on the activities summarized in the Annual Report.

10.1.2. Measurable Goals

- Post the City's most recent SWMP update on the website after its approval by EPD.
- Post each Annual Report on the website after its approval by EPD.

10.1.3. Schedule

- Annual, 2017 – 2022: Post Annual Report and most recent SWMP Update

10.1.4. Items to be Included in Annual Report

- Comments received by the City on the SWMP or Annual Report and a description of how they were addressed.

10.2. REGIONAL SWMP COMMITTEE

10.2.1. Description

To create opportunities for citizens to be participate in the SWMP, the City will work with Chatham County and the other jurisdictions within Chatham County to form a regional SWMP committee. The committee will encourage public participation by inviting citizens to attend an informational meeting that discusses the City's SWMP and educates citizens on the City's SWMP program and proper stormwater management practices to lessen pollutants in the MS4. The Committee will also serve as an advisory panel to the municipalities, providing opportunities for the jurisdictions to discuss stormwater practices that are effective and seek solutions for stormwater-related issues.

Each jurisdiction will be invited to nominate a department representative to sit on the Committee. The Committee will meet at a minimum of once/year, if not more frequently, and at least one meeting per year (or a session during the meeting time) will be made open to the public. The meetings may be held separately, or in conjunction with each other. The Public meeting will be advertised within each participating municipality to ensure that all citizens are notified of the meeting.

10.2.2. Measurable Goal

- Notify public within each jurisdiction of SWMP Meeting.
- Hold annual meeting of the regional SWMP Committee that is open to the public to discuss stormwater issues.
- Hold at least one meeting per year with SWMP Committee staff department members.

10.2.3. Schedule

- Annual, 2017 – 2022. Convene meetings

10.2.4. Items to be Included in Annual Report

- Summary of the public meeting announcement, including the date and method of publication
- Agendas and sign in sheets for SWMP Committee meeting.

10.3. EDUCATIONAL BOOTH

10.3.1. Description

The City hosts an annual public education and outreach event called Stand Up for America Day the last Saturday of April. At this event, the City will host a stormwater and water resources related educational booth. The booth will highlight stormwater pollution prevention topics and related information. Brochures and/or other educational materials will be distributed. The brochures will address topics such the following:

- Stormwater Pollution Prevention
- Public Education and Awareness
- Picking Up After Your Pet
- Proper Handling and Disposal of Hazardous and Toxic Wastes
- Construction BMPs
- Septic System Maintenance
- Flood Information

10.3.2. Measurable Goals

- Set up booth at Stand Up For America Day to educate the public about stormwater and water resources
- Distribute educational literature

10.3.3. Schedule

- Annual, 2017 – 2022: Set up booth and distribute educational literature

10.3.4. Items to be Included in Annual Report

- Date and description of the event, including an estimate of the number of volunteers that attend the event
- Copy of and/or description of educational materials that were distributed

11. POST CONSTRUCTION

Permit Section 3.3.11: Post-Construction

11.1. POST CONSTRUCTION STORMWATER CONTROLS

11.1.1. Description

The City of Port Wentworth has adopted Post Construction Stormwater Controls within its Stormwater Management Ordinance, Chapter 7, Article III, Division 3, Post Construction Stormwater Runoff. The performance standards within this ordinance are consistent with the CSS and the City's NPDES Phase I MS4 Permit. The Stormwater ordinance details the rules and regulations governing post-development stormwater management practices for new development and redevelopment. The regulations require performance standards consistent with Section 3.3.11(a)(2) of the Permit for all developments and redevelopments adding or replacing more than 5,000 square feet of impervious surface. This Division also required developments to utilize the standards, criteria, and information presented in the latest edition of the CSS, the GSMM, and any relevant local addenda, for the proper implementation of this division.

The City will apply their adopted performance standards during the design of City-construction projects, with the possible exception of linear projects. If the City designs a linear construction project, for which it would be impossible to apply the performance standards, the City will develop a feasibility program which sets reasonable criteria for determining when implementing performance standards for linear projects is infeasible. This will be submitted to EPD, and applied to future linear construction projects only upon approval.

11.1.2. Measurable Goal

- Annually evaluate the City of Port Wentworth Stormwater Management Ordinance for post construction stormwater runoff requirements to determine if revisions are required.
- Update the ordinance, if required.
- Enforce the use of the Stormwater Management Ordinance, Division 3: Post Construction Stormwater Runoff for development that meets the standard above.
- If and when needed, develop linear project feasibility program to apply to future linear projects.

11.1.3. Schedule

- Ongoing, 2017 – 2022: Enforce the use of the Stormwater Management Ordinance, Division 3: Post Construction Stormwater Runoff during plan review.
- Annual, 2017 – 2022: Review of Stormwater Management Ordinance, Division 3: Post Construction Stormwater Runoff.

- If and when needed, develop linear project feasibility program, and submit to EPD for approval.

11.1.4. Items to be included in Annual Report

- Number of post construction stormwater runoff plans reviewed and approved during the reporting period.
- If the Stormwater Management Ordinance, Division 3: Post Construction Stormwater Runoff is updated during the reporting period, include the updated ordinance.
- If developed, linear project feasibility program.

11.2. GREEN INFRASTRUCTURE/LOW IMPACT DEVELOPMENT (GI/LID)

Permit Section 3.3.11: Post-Construction, Table 3.3.11(b)(2)

11.2.1. Legal Authority and Ordinance Review

11.2.1.A. Description

The City of Port Wentworth has performed an assessment of its existing codes to determine if there are any codes that present an obstacle to GI/LID approach to stormwater management. The City utilized the Code and Ordinance Worksheet developed by the Center for Watershed Protection (CWP). The completed checklist and summary of recommended actions were included in the City's 2011-2012 Annual Report

Currently, the City of Port Wentworth has adopted the required Coastal Stormwater Supplement ordinance and design manual. While there is always room for improvement, this ordinance and associated guidelines encourage a green infrastructure approach to the development process.

11.2.1.B. Measurable Goals

- If additional revisions to the City's Code are made to facilitate GI/LID, changes will be submitted to EPD as part of the annual report.

11.2.1.C. Schedule

- Annual, 2017 – 2022: Review of City Ordinances

11.2.1.D. Items to be Included in Annual Report

- If updates to the City's Ordinances are made to facilitate GI/LID during the reporting period, include the updated code(s).

11.2.2. GI/LID Program

11.2.2.A. Description

The City of Port Wentworth has developed and implemented a GI/LID Plan to address the following elements of the City's GI/LID program:

1. GI/LID techniques and practices
2. GI/LID structure inventory
3. GI/LID inspection and maintenance program

The GI/LID Plan was submitted to EPD for approval in the 2015 Annual Report. A copy of the GI/LID Plan is included in Appendix G. The City will annually review the GI/LID Program and make changes as needed.

11.2.2.B. Measurable Goals

- Review the GI/LID Plan annually and make updates as needed.

11.2.2.C. Schedule

- Annual 2017 – 2022: Review GI/LID Plan, and update as needed.

11.2.2.D. Items to be Included in Annual Report

- Any updates to GI/LID Plan

11.2.3. GI/LID Structure Inventory

11.2.3.A. Description

The City maintains an inventory of privately-owned non-residential and publicly-owned water quality-related Green Infrastructure (GI) / Low Impact Development (LID) structures located within the City Limits of Port Wentworth. The inventory will include at a minimum: bioswales, pervious pavements, rain gardens, cisterns, green roofs, and any other structure deemed appropriate by the City. The inventory is included as an attachment to the GI/LID program, in Appendix G, and includes the following information about each structure:

- Type of Structure
- Location of Structure
- Date of Last Inspection

New GI/LID structures are identified through the plan review process and added to the inventory.

11.2.3.B. Measurable Goals

- Update the inventory with new GI/LID structures and submit the updated inventory in each annual report.

11.2.3.C. Schedule

- Annual 2017 - 2022 – Update GI/LID structure inventory

11.2.3.D. Items to be included in Annual Report

- Most recent GI/LID Inventory

11.2.4. Inspection and Maintenance Program

11.2.4.A. Description

The City has developed a program to ensure that inspections are conducted on 100% of the privately owned non-residential and publicly owned GI/LID structures within a 5-year period, beginning in June 2017. Maintenance will also be performed on all publicly-owned GI/LID structures, as needed, beginning in June 2017.

The City requires developers of privately-owned non-residential GI/LID structures to complete an Inspection & Maintenance Agreement with the City, prior to the issuance of a permit for any land development activity. The Inspection & Maintenance Agreement, a model of which is included as an attachment to the GI/LID Program in Appendix G, details the following information:

- The person(s) responsible for carrying out the inspection and maintenance.
- A maintenance schedule stating when and how often routine inspection and maintenance will occur.
- Plans for annual inspections to ensure proper performance of the stormwater management system between scheduled maintenance.
- The Inspection & Maintenance agreement and plan is approved by the city and recorded with the deed upon approval of the stormwater management design plan.

During routine inspections, if the City staff determine that the owner is not properly maintaining their non-residential GI/LID structures, they will enforce the provisions of the Inspection & Maintenance Agreement and the Stormwater Management Ordinance.

11.2.4.B. Measurable Goals

- Inspect 100% of the total privately owned non-residential and publicly owned GI/LID structures within a five-year period. Provide the number and/or percentage of the total structures inspected during the reporting period in each annual report.
- Ensure that private owners are maintaining privately-owned non-residential GI/LID structures in accordance with their Inspection & Maintenance Agreements.
- Conduct maintenance on all publicly owned GI/LID structures, in accordance with the procedures included in the GSMM and CSS.

11.2.4.C. Schedule

- Annual, 2017 - 2022 – Inspect at least 5% of non-residential GI/LID structures.
- Annual, 2017 - 2022 – Inspect and maintain at least 5% of publicly-owned GI/LID structures.

11.2.4.D. Items to be Included in Annual Report

- Number and percentage of GI/LID structures inspected during the reporting period

- Number and percentage of publicly-owned GI/LID structures maintained during the reporting period.
- Copies of any Inspection & Maintenance Agreements executed during the permit period.