

MS4 Program Plan

Permit # VAR040135

Stormwater Discharge From Small Municipal Separate Storm Sewer Systems

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1.0 EXECUTIVE SUMMARY

The City of Radford is committed to the development, refinement, implementation, and enforcement of a Municipal Separate Storm Sewer System (MS4) Program Plan (Plan) to reduce the discharge of pollutants from the regulated MS4 (urbanized areas of the City) to the maximum extent practicable (MEP), as per VPDES Permit No. VAR040135. The focus of the proposed program will be to 1) protect water quality, 2) improve waters into which the regulated small MS4 discharges, and 3) meet the requirements of state and federal regulations.

The City of Radford's MS4 Organizational Structure is provided in Appendix A.

The City of Radford MS4 Program Plan includes and addresses the following minimum control measures (MCMs) and schedule for implementation:

- (1) Public Education and Outreach on Stormwater Impacts
- (2) Public Involvement and Participation
- (3) Illicit Discharge Detection and Elimination
- (4) Construction Site Stormwater Runoff Control
- (5) Post-Construction Runoff Control Management
- (6) Pollution Prevention and Good Housekeeping for Municipal Operations

Additionally, the Plan also address special conditions for approved total maximum daily loads (TMDL), when a wasteload allocation (WLA) is assigned to the City of Radford. Currently, there are no applicable WLAs assigned to the City. Any modifications to this Program Plan will be documented as part of the annual report submittals.

Included with this document is a summary of the MCMs and proposed BMPs; a list of supporting documents, existing policies, ordinances, schedules, inspection forms, written procedures, and other documents necessary for BMP implementation; the responsible parties; the objectives and expected results of each BMP; implementation schedule of each BMP; and a method that will be utilized to determine the effectiveness of each BMP.

2.0 MCM 1: PUBLIC EDUCATION & OUTREACH

This minimum control measure is intended to implement a diverse public education program to increase target audience knowledge about the steps that can be taken to reduce stormwater pollution and hazards associated with illegal discharges and improper disposal of waste.

The City of Radford MS4 Program Plan for MCM 1 will be developed to meet the following criteria:

1. Identify, at a minimum, three high-priority water quality issues that contribute to the discharge of stormwater and a rationale for the selection of the three high-priority water quality issues;
2. Identify and estimate the population size of the target audience or audiences who is most likely to have significant impacts for each high-priority water quality issue;
3. Develop relevant message or messages and associated educational and outreach materials for message distribution to the selected target audiences while considering the viewpoints and concerns of the target audiences including minorities, disadvantaged audiences, and minors;
4. Provide for public participation during public education and outreach program development;
5. Annually conduct sufficient education and outreach activities designed to reach an equivalent 20% of each high-priority issue target audience; and
6. Provide for the adjustment of target audiences and messages including educational materials and delivery mechanisms to reach target audiences in order to address any observed weaknesses or shortcomings.

BMP 1.1 – Identify High Priority Water Quality Issues

Description: The City identified three (3) high-priority water quality issues: 1) proper disposal of pet waste, 2) collection of yard waste and leaf debris, and 3) nutrient management education.

1. Pet Waste Disposal

- a. This program raises awareness of the need for proper disposal of pet waste to avoid release of bacteria into the stormwater system and, in turn, the New River.
- b. Target Audience
 - i. Pet Owners in the City of Radford
 - ii. Public Park Users in the City of Radford
 - iii. Dog Park Users in the City of Radford
- c. Population size of the target audience or audiences to have significant impact on high-priority water quality issue: 11,000
- d. Distribution of Educational Materials
 - i. Hand out with Dog Tags at the Treasurer's Office
 - ii. Post in Local Veterinarian Offices on Bulletin Boards
 - iii. Post in City buildings, including: City Administration, Recreation Center, Library, Courthouse
 - iv. Post on City's Website
 - v. Attend special events and distribute materials

2. Yard Waste and Leaf Debris

- a. This program educates citizens about proper disposal of yard waste (grass clippings, leaves, etc.) to reduce the amount of such waste discarded into the City's storm sewer drains. In addition, the City collects yard waste as part of a composting program that develops topsoil for City use. These programs help reduce clogging in the storm sewer network and reduce pollutants (i.e. fertilizers, herbicides, and pesticides) from entering the storm sewer network.
- b. Target Audience
 - i. Homeowners in the City of Radford
 - ii. Renters in the City of Radford
 - iii. Landscapers in the City of Radford
- c. Population size of the target audience or audiences to have significant impact on high-priority water quality issue: 5,000
- d. Distribution of Educational Materials
 - i. Post in City buildings, including: City Administration, Recreation Center, Library, Courthouse
 - ii. Post on City's website
 - iii. Attend special events and distribute materials

3. Nutrient Management

- a. The City has produced a "Resident's Guide for a Cleaner Environment" brochure to be distributed to citizens and to educate them about nutrient management for their own properties. This brochure is coordinated with the City's internal efforts to develop Nutrient Management Plans for City-owned property.
- b. Target Audience
 - i. Homeowners in the City of Radford
 - ii. Renters in the City of Radford
 - iii. Landscapers in the City of Radford
- c. Population size of the target audience or audiences to have significant impact on high-priority water quality issue: 5,000
- d. Distribution of Educational Materials
 - i. Post in City buildings, including: City Administration, Recreation Center, Library, Courthouse
 - ii. Post on City's website
 - iii. Attend special events and distribute materials

Schedule and Evaluation: The City will continue to implement the programs in place, including brochures, while evaluating the effectiveness of the programs. The City will review the programs and implement improvements, as needed, to increase awareness.

Responsible Party: Engineering Department

Supporting Documents: Appendix B – Be the Solution to Stormwater Pollution Poster (the combined poster for the three high priority water quality issues)

Measureable Goals: The City will continue to evaluate the effectiveness of the current programs and develop ways to improve and increase awareness and participation.

Items to be included in the Annual Report: Specific activities completed, estimated number of people reached, and estimated percentage of the target audience reached.

BMP 1.2: Pet Waste Management for Public Parks

Description: The City will continue to enforce current policies requiring pet owners to clean up after their animals while in public parks.

Schedule and Evaluation: The City's Parks & Recreation Department enforces the current Pet Waste Management Program in the three heaviest used public park areas within the City's Park system: Bisset Park, Wildwood Park, and the William D. Lorton, Jr. "Sparky's Run" Dog Park. The Department will continue to evaluate the effectiveness of the program, adding or relocating the pet waste bag dispensers based on observations of their use and according to input received by the public.

Responsible Party: Parks & Recreation Department

Supporting Documents: The regulation is stated on the City's website for the William D. Lorton, Jr. "Sparky's Run" Dog Park.

Measureable Goals: The City will continue to evaluate the effectiveness of the current programs and develop ways to improve and increase awareness and participation.

Items to be included in the Annual Report: Specific activities completed during the reporting period.

BMP 1.3: Drain Marking Program

Description: The City implemented a Storm Drain Marking Program. This involved performing an inventory of the storm drain locations and identifying the drains most easily accessible to the public and vulnerable to illicit dumping.

Schedule and Evaluation: The City's storm sewer network was mapped using GIS. 100% of the curb inlets and grate inlets in the City have been marked.

Responsible Party: Engineering Department

Supporting Documents: Storm sewer system and outfall mapping (Appendix E)

Measureable Goals: Completed.

Items to be included in the Annual Report: A statement as to whether new storm sewers and outfalls were mapped and marked.

3.0 MCM 2: PUBLIC INVOLVEMENT/PARTICIPATION

This minimum control measure is intended to implement a program that helps to inform and educate City residents about the City of Radford Stormwater Program.

The City of Radford developed the MS4 Program Plan for MCM 2 to meet the following criteria:

1. Post copies of the annual report on the website;
2. Notify the public and provide for receipt of comment of the proposed MS4 Program Plan;
3. Participate in a minimum of four (4) local activities annually; and
4. Develop written procedures for implementing the program.

BMP 2.0: Enhance City Website to Include Stormwater Related Information

Description: The City's will continually update the website with stormwater related information. Included will be links to the relevant sections of the Virginia DEQ and EPA websites, and links to the City's relevant ordinances, MS4 Program Plan and annual reports.

Schedule and Evaluation: The City will maintain the website with the most current stormwater management and MS4 documentation.

Responsible Party: Engineering Department/Public Information Department

Supporting Documents: Local Ordinances, Public Education Materials, MS4 Program Plan, Annual Reports

Measurable Goals: Annual updates of the website.

Items to be included in the Annual Report: A link to the webpage.

BMP 2.1: Annual Stream Clean-up Events

Description: The City and its partner organizations will continue to sponsor clean up events that encourage the public to engage in cleaning up the streams, river and roadways within the City Limits. The program will focus on removing foreign debris, litter, etc. Events will be publicized through various media in order to have as much participation as possible.

Schedule and Evaluation: City and its partner organizations have been sponsoring these programs for a number of years. The City will continue to increase awareness of events in order to improve participation. Events include a regional river clean up event, a Pathways cleanup event, and renewing of Radford's Adopt-A-Spot Program.

Responsible Party: Public Information Department

Supporting Documents: Website and Various Media Announcements

Measurable Goals: At least one stream clean-up event per year.

Items to be included in the Annual Report: A summary of the stream clean-up events and its accomplishments.

BMP 2.2: Develop Public Outreach Plan

Description: The City developed a plan to identify the target audience and develop strategies to reach a minimum of 20% of the target audience (the City’s citizens) annually through public outreach activities. As part of the plan, the goal will be to have a minimum of four (4) public participation events annually.

Schedule and Evaluation: The City will have a minimum of four (4) public participating events annually, and were identified by the City as follows.

1. NRV Regional Household Hazardous Waste Collection Day: This event addresses the nutrient management high-priority water quality issue. City citizens participate in this event to properly dispose of hazardous material that may otherwise be subject to stormwater and polluted runoff into the waterways.
2. Native American Heritage Festival in Bisset Park: This event addresses the pet waste disposal, yard waste and leaf debris, and nutrient management high-priority water quality issues. This is a City-sponsored event that includes a booth staffed by City employees to promote awareness of the City’s stormwater initiatives and good land stewardship, and provide hand out literature and educational materials.
3. Adopt A Spot Program Sign Ups: This event addresses yard waste and leaf debris, and nutrient management high-priority water quality issues. This program encourages citizen participation in litter cleanup of designated areas in their community at regular intervals to help keep pollutants from entering waterways.
4. Radford Highlanders Festival in Bisset Park: This event addresses the pet waste disposal, yard waste and leaf debris, and nutrient management high-priority water quality issues. This is a City-sponsored event that promotes river awareness and stormwater initiatives, including literature and educational materials. Portable “Doggie Spots” are placed through the event to encourage pet owners with their dogs present to clean up after their K-9.

The above events are ongoing and/or annual, will occur again during the coming plan year, and are anticipated to draw a 5% increase in attendance compared to the current plan year.

Responsible Party: Engineering Department and Public Information Department

Supporting Documents: Website and Various Media Announcements

Measureable Goals: The City will continue to evaluate the effectiveness of the current programs and develop ways to improve and increase awareness.

Items to be included in the Annual Report: Specific activities completed and estimated number of people reached/attended.

4.0 MCM 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION

This minimum control measure is intended to detect and eliminate illicit discharges to the MS4 storm system.

The City of Radford developed the MS4 Program Plan for MCM 3 to meet the following criteria:

- (1) Identify MS4 Outfalls and develop a storm sewer system map and associated table of information for each outfall;
- (2) Effectively prohibit, through ordinance or other legal mechanism, non-stormwater discharges into the storm sewer system;
- (3) Develop, implement, and update, when appropriate, written procedures to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping; and
- (4) Promote, publicize, and facilitate public reporting, inspections, and corrective measures of illicit discharges into or from any MS4.

BMP 3-1: Illicit Discharge Ordinance

Establish a program to detect and eliminate illicit discharges in to the Municipal Separate Storm Sewer System by developing and adopting regulations and an enforcement program to prevent illegal discharges into the MS4 storm drain system.

Description: The City implemented an Illicit Discharge Detection and Elimination Ordinance that prohibits illegal and illicit dumping of non-stormwater discharges. The ordinance addresses detection, identification of source of discharge, mechanisms to eliminate discharges, and tracking. The ordinance facilitates public reporting of illicit discharges.

Schedule and Evaluation: Radford City Council adopted an Illicit Discharge Detection and Elimination Ordinance, Ordinance 1681, on July 11, 2016.

Responsible Party: Engineering Department and City Administration

Supporting Documents: Appendix C - Ordinance 1681, City of Radford Standard Operating Procedure: IDDE: Outfall Screening, City of Radford MS4 Illicit Discharge Program Dry Weather Screening, MS4 Outfall Field Screening Report, Illicit Discharge Incident Tracking Sheet, Illicit Discharge Incident Report 2018-1

Measurable Goals: Continued enforcement of Ordinance 1681

Items to be included in the Annual Report: A summary of number of outfalls screened during the period, screening results, and details of follow-up actions, if any taken at this time. Summaries of any investigations of suspected illicit discharges will also be included.

BMP 3.2 – Protect Sensitive Areas by use of City Code

Description: The City adopted by Ordinance two “overlay districts” (Floodplain Overlay District and Riverfront Corridor Overlay District) within the City Code that protects areas within the floodplain and adjacent to the New River. (Division 15 and 16 of Chapter 120.1: Zoning)

Schedule and Evaluation: The City will continue to enforce these ordinances during the years of the permit cycle.

Responsible Party: City Administration, Engineering Department and Zoning Department

Supporting Documents: Appendix D - Zoning Overlay Districts defined in City Code, and the City of Radford Virginia Zoning & Flood District Map

Measurable Goals: Enforce ordinance sections that control development in sensitive areas

Items to be included in the Annual Report: Revisions to the ordinances or maps, if any.

BMP 3-3: Outfall Map and Database

Develop, maintain, and update a Outfall Map and Database to include the following information as required by the MS4 General Permit (9VAC25-890-40).

- (1) The name and location of all waters receiving discharges from the MS4 outfalls and the associated HUC;
- (2) The location of all MS4 outfalls with unique identifier; and
- (3) An information table for each outfall to include the unique identifier, the estimated MS4 acreage served, the name of the receiving surface water, a note whether the receiving water is listed as impaired, and the name of any applicable TMDL or TMDLs.

Schedule and Evaluation: The mapping is completed. This mapping will be used to track illicit discharges.

Responsible Party: Engineering Department

Supporting Documents: Appendix E - City of Radford Stormwater Management Map and MS4 Outfall Screening Map, Outfall Information Table, and Outfall Inspection Forms

Annual Reporting Requirements: Provide updates, if any.

5.0 MCM 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

This minimum control measure is intended to reduce pollutants in stormwater runoff from land disturbing activities to the MS4 storm system.

The City of Radford previously established an Erosion and Sediment Control program, which meets the requirements of the MCM.

1. An Erosion and Sediment Control Ordinance to require erosion and sediment controls, as well as sanctions to ensure compliance, under local law for all land disturbances of 10,000 square feet or more.
2. Ordinance requirements for plan approval prior to land disturbance and construction site operators to implement appropriate erosion and sediment control best management practices.
3. Erosion and Sediment Control inspection procedures as required by the MS4 General Permit.

The City of Radford developed MS4 Program Plan for MCM 4 to meet the following criteria:

- (1) Provide a description of the legal authorities utilized to ensure compliance with the minimum control measures in Section II related to construction site stormwater runoff control such as ordinances, permits, orders, specific contract language, and inter-jurisdictional agreements;
- (2) Develop written plan review procedures and all associated documents utilized in plan review;
- (3) Develop written inspection procedures and all associated documents utilized during inspection including the inspection schedule;
- (4) Develop written procedures for compliance and enforcement, including a progressive compliance and enforcement strategy, where appropriate;
- (5) Define the roles and responsibilities of each of the operator's departments, divisions, or subdivisions; and
- (6) Develop a tracking and reporting mechanism for regulated land-disturbing activities to provide the required reporting in all subsequent annual reports.

BMP 4.0 – Erosion and Sediment Control Ordinance

Description: Adopt and maintain an ordinance in the City Code that requires compliance with the Virginia Erosion and Sediment Control regulations.

Schedule and Evaluation: The City has an Erosion and Sediment Control (ESC) Ordinance (Chapter 31, Articles 1 &2) that complies with the Virginia Erosion & Sediment Control regulations, requires evidence of coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities, as applicable, prior to beginning land disturbance, provides for inspection of land disturbing activities by the City and details available enforcement options.

Responsible Party: Engineering Department

Supporting Documents: Appendix F - ESC Ordinance, Radford VSMP Administrative Guidance Manual (Plan Review Procedures), Radford Erosion and Sediment Control Inspection Process/Procedures, City of Radford Erosion and Sediment Plan Inspection Report, Radford Erosion & Sediment Control Compliance and Enforcement Procedure

Measurable Goals: Enforcement of the ordinance.

Items to be included in the Annual Report: Number of acres disturbed, number of inspections conducted, summary of enforcement actions taken.

BMP 4.1 – City Staff Training

Description: The City staff that is involved in implementing the ESC Ordinance will maintain the appropriate VA DEQ certifications.

Schedule and Evaluation: The City will maintain a database of the certifications required of City employees. The database includes the type of certification, name of employee, expiration date of current certifications.

Responsible Party: Engineering Department

Supporting Documents: Copies of certification documentation.

Measurable Goals: All appropriate staff will maintain required certifications

Items to be included in the Annual Report: Updates to certifications, as needed.

6.0 MCM 5: POST-CONSTRUCTION STORMWATER MANAGEMENT

This minimum control measure is intended to reduce pollutants in stormwater runoff from developed properties to the MS4 storm system. The post-construction stormwater management program will include the following elements:

- (1) A Stormwater Management Ordinance;
- (2) Written policies and procedures utilized to ensure that stormwater management facilities are designed and installed in accordance with Section II B 5 b of the MS4 General Permit;
- (3) Written inspection policies and procedures utilized in conducting inspections;
- (4) Written procedures for inspection, compliance and enforcement to ensure maintenance is conducted on private stormwater facilities to ensure long-term operation in accordance with approved design;
- (5) Written procedures for inspection and maintenance of operator-owned stormwater management facilities;
- (6) Roles and responsibilities for implementing MCM 5; and
- (7) A stormwater management facility tracking and reporting mechanism.

BMP 5.01 – Adopt a Stormwater Ordinance to Control Impacts of Runoff

Description: The City's Stormwater Ordinance addresses both post-construction stormwater management and illicit discharges. The ordinance complies with the Virginia Stormwater Management Program (VSMP) regulations.

Schedule and Evaluation: The City implemented the Stormwater Management Ordinance No. 1662 on October 27, 2014.

Responsible Party: City Engineering Department and City Administration

Supporting Documents:

Appendix F - Radford VSMP Administrative Guidance Manual (design and construction guidance, procedures for inspection, inspection forms, compliance and enforcement, and procedures for inspection and maintenance of operator-owned stormwater management facilities)

Appendix G - Stormwater Management Ordinance, Long-Term Stormwater Management Facility Maintenance Agreement, Radford Inspecting Stormwater Management Facilities

Measurable Goal: Enforcement of the Stormwater Management Ordinance.

Items to be included in the Annual Report: Revisions to the stormwater ordinance, if any.

BMP 5-02: Stormwater Management Tracking and Reporting System

Description: Develop and maintain a database of all known operator-owned and privately-owned stormwater management facilities that discharge into the MS4 storm system for tracking and reporting. Database attributes for each stormwater management facility shall include the following:

1. Facility type and BMP Clearinghouse specification reference number;
2. Location (address or latitude and longitude);
3. Total area treated, including delineation of pervious and impervious area;
4. Completion date; if unknown, assume June 30, 2005;
5. The sixth order hydrologic unit code (HUC) where the facility is located;
6. Name of any impaired water segments within each HUC listed in the 2010 §305(b)/303(d) Water Quality Assessment Integrated Report to which the facility discharges;
7. Ownership information (private or public); and
8. Date of most recent inspection and name of inspector.

Schedule and Evaluation: Use of electronic database of all stormwater management facilities for tracking and reporting with the annual report.

Supporting Documents:

Appendix H - City of Radford Annual BMP Operation & Maintenance Inspection Form for Detention, Retention and Extended Detention Basins and Wet Ponds; MS4 SMF Tracking Database

Responsible Party: Engineering Department

Items to be included in the Annual Report: A database of all stormwater management facilities, including those completed during each reporting year, with the annual report.

7.0 MCM 6: POLLUTION PREVENTION/GOOD HOUSEKEEPING

This minimum control measure is intended to reduce pollutants in stormwater from daily operations and maintenance activities and municipal facilities, and from turf and landscape areas. The pollution prevention/good housekeeping plan will include the following elements:

- (1) Written protocols being used to comply with the MS4 General Permit the daily operations and maintenance requirements;
- (2) A list of all municipal high-priority facilities that identifies those facilities that have a high potential for chemicals or other materials to be discharged in stormwater and a schedule that identifies the year in which an individual stormwater pollution prevention plan (SWPPP) will be developed for those facilities required to have a SWPPP;
- (3) A list of lands where nutrients are applied to a contiguous area of more than one acre (Appendix I – Nutrient Management Plan, page 4);
- (4) A turf and landscape nutrient management plan (Appendix I); and
- (5) A written training plan for the next reporting cycle.

BMP 6.01 – Standard Operating Procedures and Employee Training

Description: The City developed standard operating procedures (SOPs) and implemented an employee-training program designed to raise awareness within city employees of stormwater management practices as it relates to specific tasks and assignments.

Schedule and Evaluation: The City developed SOP's for employees as a guide for pollution prevention/good housekeeping. The City continually review and revise the SOPs, as needed.

Responsible Party: Engineering Department and City Administration

Supporting Documents:

Appendix J – Standard Operating Procedures

Measurable Goals: Each employee will participate in at least one training session per year; new employees will have training within three months of start date; new employees at a site with a SWPPP will have training within one month of start date.

Items to be included in the Annual Report: Number of employees attending training along with dates of attendance.

BMP 6.02 – Municipal SWPPPS

Description: The City will continue to evaluate its operations and facilities for ways to reduce discharge of pollutants. This evaluation will include identifying potential sources of pollution, prioritizing problem areas, and determining methods to address and correct the problems. Some of these methods might include employee training, spill prevention plans, SWPPPs, implementing new procedures, etc.

Schedule and Evaluation: Evaluation will be ongoing throughout the permit cycle. 50% of the SWPPPs will be developed in 2017. The remaining 50% will be prepared in 2018.

Responsible Party: All City Departments.

Supporting Documents:

Appendix K – SWPPPs for the following sites.

1. Public Works Department Facility
2. Salt Storage Facility
3. Electric Department
4. Park Road Incinerator Site
5. Ingle’s Mountain Equipment Storage Area

Measurable Goals: Implementation of the SWPPPs and SOPs.

Items to be included in the Annual Report: Listing of the completed SWPPPs, and additional SWPPPs needed, as may be identified.

BMP 6.1 – Reduce the amount of solid waste from City-owned facilities by encouraging employees to recycle waste.

Description: The City has an active recycling program that encourages City employees to participate. The City will continually evaluate the program for ways to improve and increase participation.

Schedule and Evaluation: The City will continue to recycle all categories of waste during all years of the permit cycle.

Responsible Party: Public Works Department

Supporting Documents: Recycling Program Plan, tonnage reports.

Measurable Goals: Continue program, including training, through the years of the permit cycle.

Items to be included in the Annual Report: Tonnages reports of recycled material.