



City of Port Wentworth, Georgia

Stormwater Management Plan

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

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Environmental Protection Division
Georgia Department of Natural Resources

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TABLE OF CONTENTS

APPENDICES	IV
ACRONYMS/DEFINITIONS	V
EXECUTIVE SUMMARY	VI
SHARING RESPONSIBILITY.....	VI
SWMP IMPLEMENTATION RESPONSIBILITY	VII
1. STRUCTURAL & SOURCE CONTROL PROGRAMS.....	1
1.1. STRUCTURAL CONTROLS MS4 OPERATIONS & MAINTENANCE PROGRAM.....	1
1.1.1. <i>MS4 Inventory</i>	1
1.1.2. <i>MS4 Inspection and Maintenance Program</i>	2
1.1.3. <i>Private Structural Control Inspection Program</i>	4
1.2. PLANNING PROCEDURES FOR POLLUTANT CONTROL.....	5
1.2.1. <i>Comprehensive Plan</i>	5
1.3. STREET, ROAD & HIGHWAY OPERATING PROCEDURES	6
1.3.1. <i>Street Sweeping Program</i>	6
1.3.2. <i>Roadside Ditch Maintenance</i>	6
1.3.3. <i>De-icing Procedures</i>	7
1.3.4. <i>Roadway Construction Erosion & Sedimentation Control</i>	7
1.4. FLOOD MANAGEMENT MEASURES	7
1.4.1. <i>Flood Management Capital Improvement Project Water Quality Impact Assessment for New Projects and Retrofits</i>	7
1.5. MUNICIPAL LANDFILL & WASTE CONTROL FACILITY POLLUTANT MONITORING PROGRAMS.....	8
1.5.1. <i>Municipal Waste Facilities</i>	8
1.5.2. <i>Municipal Facilities with the Potential to Cause Pollution</i>	8
1.6. PESTICIDE, HERBICIDE, & FERTILIZER CONTROLS.....	9
1.6.1. <i>Pesticide Applicator Certification Program</i>	9
1.6.2. <i>City Right-of Way Vegetation Maintenance Program</i>	9
1.7. MUNICIPAL EMPLOYEE TRAINING	9
2. ILLICIT DISCHARGE DETECTION & ELIMINATION PROGRAMS	10
2.1. LEGAL AUTHORITY	10
2.1.1. <i>Illicit Discharge Regulations</i>	10
2.1.2. <i>Litter Regulations</i>	10
2.2. DRY WEATHER SCREENING PROGRAM FOR ILLICIT DISCHARGE DETECTION	10
2.3. INVESTIGATIVE PROCEDURES FOR SUSPECTED ILLICIT DISCHARGES	11
2.4. SPILL PREVENTION, CONTAINMENT & RESPONSE PROCEDURES	11
2.4.1. <i>Hazardous Material Spill Containment & Response Procedures</i>	11
2.4.2. <i>Hazardous Material Record Keeping</i>	11
2.5. PROGRAMS TO PROMOTE, PUBLICIZE & FACILITATE PUBLIC REPORTING OF ILLICIT DISCHARGES ..	11

2.5.1.	<i>Citizen Complaint Program</i>	12
2.5.2.	<i>Stormwater Management Webpage</i>	12
2.6.	PROGRAMS TO PROMOTE THE PROPER MANAGEMENT & DISPOSAL OF USED OIL & OTHER HAZARDOUS SUBSTANCES.....	12
2.6.1.	<i>Recycle Rama</i>	12
2.6.2.	<i>Household Hazardous Material Education Program</i>	12
2.6.3.	<i>Recycling Program</i>	13
2.6.4.	<i>Bulk Trash Pickup</i>	13
2.6.5.	<i>Dry Trash Pickup</i>	13
2.7.	CONTROLS LIMITING SANITARY SEWER INFILTRATION	13
2.7.1.	<i>Sanitary Sewer Inspection Program</i>	13
2.8.	MUNICIPAL EMPLOYEE TRAINING	14
3.	WASTE HANDLING & INDUSTRIAL FACILITIES POLLUTION CONTROL PROGRAMS.....	15
3.1.	PRIORITIES & PROCEDURES FOR INSPECTIONS & ESTABLISHMENT OF CONTROLS.....	15
3.1.1.	<i>Industrial Facility Inventory</i>	15
3.1.2.	<i>Industrial Stormwater Inspection Program</i>	15
3.1.3.	<i>Industrial Facility Education Program</i>	16
3.2.	MONITORING PROGRAM FOR FACILITY DISCHARGE.....	16
3.2.1.	<i>Facility Monitoring Program</i>	16
3.3.	EMPLOYEE TRAINING PROGRAM	17
4.	CONSTRUCTION SITE STRUCTURAL & NON-STRUCTURAL CONTROL PROGRAMS.....	18
5.	HIGHLY VISIBLE POLLUTION SOURCES (HVPS)	19
5.1.	HIGHLY VISIBLE POLLUTION SOURCE/FACILITY INVENTORY	19
5.2.	HVP STORMWATER INSPECTION PROGRAM	19
5.3.	EDUCATIONAL ACTIVITIES FOR HVPS	20
5.4.	MUNICIPAL EMPLOYEE TRAINING PROGRAM	20
6.	ENFORCEMENT RESPONSE PLAN (ERP).....	21
6.1.	ENFORCEMENT RESPONSE PLAN.....	21
7.	IMPAIRED WATER BODIES	22
7.1.	INCREASE THE FOCUS & IMPLEMENTATION OF SWMP ACTIVITIES WITHIN THE DRAINAGE BASINS OF WATERS LISTED ON THE ACTIVITIES 303(d) LIST	22
7.1.1.	<i>TMDL Monitoring Plan</i>	22
8.	PUBLIC EDUCATION & INVOLVEMENT PROGRAMS.....	23
8.1.	MPC COUNTYWIDE STORMWATER PUBLIC EDUCATION PROGRAM.....	23
8.1.1.	<i>MPC Natural Resources Website</i>	23
8.1.2.	<i>Waterspout E-Newsletter</i>	23
8.1.3.	<i>Stormwater Video/PSA</i>	24
8.1.4.	<i>Septic System Education Program</i>	24
8.2.	MPC COUNTYWIDE PUBLIC INVOLVEMENT PROGRAM	24

8.2.1.	<i>Recycle-RAMA</i>	24
8.2.2.	<i>Storm Drain Marking</i>	24
9.	POST CONSTRUCTION	26
9.1.	POST-CONSTRUCTION RUNOFF CONTROL REQUIREMENTS	26
9.1.1.	<i>Stormwater Management Ordinance</i>	26
9.1.2.	<i>Design Criteria/Guidelines</i>	26
9.1.3.	<i>Private Structural Control Maintenance Agreement</i>	26
9.2.	GREEN INFRASTRUCTURE/LOW IMPACT DEVELOPMENT.....	27
9.2.1.	<i>Legal Authority and Ordinance Review</i>	27

APPENDICES

- Appendix A Maps & Inventory
- 1) MS4 Inventory Map
 - 2) MS4 Inventory Table
 - 3) Highly Visible Pollutant (HVP) Sources Inventory
- Appendix B SWMP Implementation
- 1) List of Staff & Equipment Available for SWMP Implementation
 - 2) Emergency Spill Contact Numbers
- Appendix C Inspection Checklists
- 1) Industrial/HVP Stormwater Inspection Checklist
 - 2) MS4 Inspection Checklist
 - 3) Capital Improvement Project (CIP) Stormwater Impact Assessment
 - 4) Structural Control (Pond) Inspection Checklist
 - 5) Dry Weather Screening Checklist
- Appendix D Ordinances
- 1) Stormwater Management Ordinance
 - 2) Chatham County Drainage Agreement
 - 3) MPC Contract
 - 4) NPDES Phase I MS4 Permit
- Appendix E Illicit Discharge Detection and Elimination Plan
- Appendix F Enforcement Response Plan
- Appendix G Green Infrastructure
- 1) Green Infrastructure Assessment
 - 2) Green Infrastructure Plan

ACRONYMS/DEFINITIONS

BMPs	Best Management Practices
CEMA	Chatham Emergency Management Agency
CIP	Capital Improvement Project
CSS	Coastal Stormwater Supplement
E&S	Erosion & Sedimentation
EOC	Emergency Operations Center
EPD	Georgia Environmental Protection Division
ESCP	Erosion & Sedimentation Control Plan
ESF	Emergency Support Function
GaDNR	Georgia Department of Natural Resources
GEMA	Georgia Emergency Management Agency
GESA	Georgia Erosion & Sedimentation Act
GSMM	Georgia Stormwater Management Manual
GSWCC	Georgia Soil & Water Conservation Commission
IDDE	Illicit Discharge Detection & Elimination
IGP	Industrial General Permit
L.E.P.C.	Local Emergency Planning Committee
LDA	Land Disturbing Activities
LIA	Local Issuing Authority
MOU	Memorandums of Understanding
MPC	Chatham County – Savannah Metropolitan Planning Commission
MS4	Municipal Separate Storm Sewer System
MSDS	Materials Safety Data Sheet
NOI	Notice of Intent
NPDES	National Pollutant Discharge & Elimination System
NRCS	Natural Resources Conservation Service
QA/QC	Quality Assurance/Quality Control
SIC	Standard Industrial Classification
SOP	Standard Operating Procedure
SPLOST	Special Purpose Local Option Sales Tax
SWMP	Stormwater Management Plan
SWP3	Stormwater Pollution Prevention Plan
WQPP	Water Quality Protection Plan

EXECUTIVE SUMMARY

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

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

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

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

More recently, the City of Port Wentworth has been required to comply with new requirements contained within the NPDES Phase I MS4 Stormwater Permit, issued April 13, 2012, including:

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

SHARING RESPONSIBILITY

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

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

SWMP IMPLEMENTATION RESPONSIBILITY

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

SWMP Element	Responsible Party(ies)
<i>1. Structural and Source Control Measures</i>	
1.1 Structural Controls Maintenance Activities & MS4 Operations & Maintenance Program	Director of Public Works; Canal Maintenance by Chatham County, per IGA
1.2 Planning Procedures for Pollutant Control	City Administrator
1.3 Street, Road, & Highway Operating Procedures	Director of Public Works
1.4 Flood Management Measures	City Engineer
1.5 Municipal Waste Control Facility Pollutant Monitoring Programs	City Administrator
1.6 Pesticide, Herbicide & Fertilizer Programs	Director of Public Works
1.7 Municipal Employee Program	City Administrator
<i>2. Illicit Discharge Detection & Elimination Programs</i>	
2.1 Legal Authority	City Administrator
2.2 Dry Weather Screening Program for Illicit Discharges	MPC, Per MOU
2.3 Investigative Procedures for Suspected Illicit Discharges	City Administrator
2.4 Spill Prevention, Containment & Response Procedures	Emergency Manager, Director of Water & Sewer
2.5 Programs to Promote, Publicize & Facilitate Public Reporting of Illicit Discharges	Director of Public Works
2.6 Programs to Promote the Proper Management & Disposal of Used Oil & Other Hazardous Substances	MPC, Per MOU; Director of Public Works
2.7 Controls Limiting Sanitary Sewer Infiltration	City Engineer
2.8 Municipal Employee Training	City Engineer
<i>3. Waste Handling & Industrial Facilities Pollution Control Programs</i>	
3.1 Priorities & Procedures for Inspections & Establishment of Controls	City Administrator
3.2 Monitoring Program for Facility Discharge	City Administrator
3.3 Employee Training Program	City Engineer
<i>5. Highly Visible Pollution Sources (HVPS)</i>	
5.1 HVPS Facility Inventory	City Administrator
5.2 HVP Stormwater Inspection Program	City Administrator
5.3 Educational Activities for HVPS	MPC, Per MOU
5.4 Municipal Employee Training Program	City Engineer
<i>6. Enforcement Response Plan</i>	
6.1 Enforcement Response Plan	City Administrator

SWMP Element	Responsible Party(ies)
<i>8. Public Education & Involvement Programs</i>	
8.1 MPC Countywide Stormwater Public Education Program	MPC, per MOU
8.2 MPC Countywide Public Involvement Program	MPC, per MOU
<i>9. Post Construction</i>	
9.1 Post-Construction Runoff Control Requirements	City Engineer
9.2 Green Infrastructure/Low Impact Development	City Administrator

1. STRUCTURAL & SOURCE CONTROL PROGRAMS

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

1.1. STRUCTURAL CONTROLS MS4 OPERATIONS & MAINTENANCE PROGRAM

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

1.1.1. MS4 Inventory

The City completed a GIS inventory of 100% of the system in 2011. A summary of the current inventory of the City’s public MS4 system, as defined by the Extent of Service Policy, is included in Table 1 below. A map of the MS4 inventory is included in Appendix A. This inventory includes the following information related to structures within the MS4:

- Spatial location
- Structure Identification Number
- Structural Material
- Condition of Structure
- Maintenance Need
- Structure Type/Size
- Flow Direction (Inlet or Outlet)
- Photograph of the Structure
- Water Quality Issues

Table 1: City of Port Wentworth MS4 Inventory

Structure	Number	Mileage
Catch Basins/Inlets	788	
Storm Lines	514	8.74 Miles
Ditches	36	22.85 Miles
Canals*	6	5.84 Miles
MS4 Outfalls	47	
Municipal Controls	2	
Private Controls	25	

* Chatham County is responsible for maintenance and inspections per the Intergovernmental Agreement and the summary in Section 1.1.1.A below.

The MS4 inventory will be updated as new development occurs and any updates will be included in the Annual Report.

1.1.1.A. Extent of Service (EOS) Policy

This EOS policy classifies the “responsibility status” of the various drainage infrastructure components within the MS4, based upon system component location and ownership factors. The City of Port Wentworth’s EOS policy for the O&M program includes all drainage structures and systems within Port Wentworth’s public right-of-way and within City-owned easements. Additionally, Port Wentworth provides limited inspection services for private detention ponds as these facilities have the potential to adversely impact the public drainage system if they are not functioning as designed. Limited services include inspection and owner notification if the control requires maintenance.

Chatham County is responsible for the operation and maintenance of the following canals within the City of Port Wentworth’s municipal limits:

- Phillips Avenue Canal – 1.3 miles
- Little Hurst Canal – 2.9 miles
- Oxnard Canal – 0.5 miles
- Grange Road Canal – 0.8 miles
- Pumpkin Bridge Canal – 0.2 miles
- Appleby Canal – 0.14 miles

This responsibility has been formally established through the 2008 Intergovernmental Agreement between Chatham County and Port Wentworth, included in Appendix D.

1.1.2. MS4 Inspection and Maintenance Program

1.1.2.A. Inspection Schedule

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

Table 2: Port Wentworth MS4 Inspection Schedule

Year	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
Percent Inspection	10%	15%	20%	20%	20%
Number of Facilities Inspected Based on MS4 Inventory					

Year	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
Catch Basins	79	119	159	159	159
Storm Lines	51	77	102	102	102
Ditches	4	6	8	8	8
Municipal Detention Ponds/Controls	1	1	1	1	1

1.1.2.B. MS4 Inspection Procedures

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

- Inspections shall generally include a condition assessment of the various system elements including catch basins, canals, ditches, and municipal stormwater controls (i.e. detention ponds, bioretention cells, etc).
- Storm drain lines will be visually inspected where they outfall into a catch basin or open drainageway, unless access is obstructed.
- Upon completion of an inspection, the City shall make a determination of the need for maintenance based on the results of the inspection and the maintenance criteria listed herein.
- If maintenance is required, the City shall determine if the maintenance need is structural, i.e., the structure needs to be repaired or replaced; or if the maintenance need is routine, i.e. sediment needs to be cleared, debris removed, or vegetation trimmed back.
- The City shall also make a determination if the maintenance need should be prioritized, i.e. malfunction or failure of the system is possible if the maintenance need is not addressed.
- Inspections shall be documented and records of the inspections shall be maintained by the City.

1.1.2.C. MS4 Maintenance Procedures

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

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

Please note that the City has no maintenance responsibility for privately – owned stormwater control structures, therefore Port Wentworth will only inspect the condition and provide information and/or recommendations on proper maintenance to the private owners. If the private owner fails to maintain their structural control in accordance with any approved Maintenance Agreement with the City, then the City has the legal authority, per the Stormwater Ordinance, to perform the necessary maintenance and recover the cost from the private owner.

1.1.3. Private Structural Control Inspection Program

The City will inspect private structural controls that have the potential to impact the public MS4 to determine if they are in proper working condition and to determine if any maintenance is required. The City’s current drainage system inventory includes 25 private detention ponds, which will be inspected according to the following schedule. All new ponds will be inspected by the City prior to acceptance of the final plat to ensure that the final construction is consistent with the developer’s approved design.

Table 3: Port Wentworth Private Structural Control Inspection Schedule

Year	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
Percent Inspection	10%	15%	20%	20%	20%
Number of Facilities Inspected Based on MS4 Inventory					
Private Detention Ponds	3	4	5	5	5

It is the private property owner’s responsibility to ensure that their privately owned stormwater control(s) continues to function as designed. If maintenance is needed, the City

will address new and existing private structural controls as follows.

- If the pond is deemed deficient in some manner during inspection, or maintenance is not performed in accordance with the agreement (if one exists), the City will notify the private owner within five business days.
- The City will inform the owner of the nature of the deficiency, recommend actions to be taken, and provide a schedule for the recommended actions depending on the nature of the problem.
- The City will perform a follow up inspection to ensure that any necessary maintenance activities have been performed by the owner.
- If necessary, enforcement is dealt with on a case-by-case basis in accordance with the City's Stormwater Management Ordinance.
- The Public Works Department, or contracted maintenance crew, will perform maintenance responsibilities on an emergency basis only.
- A record of all inspection and enforcement activities will be maintained by the City and provided in the Annual Report.

1.2. PLANNING PROCEDURES FOR POLLUTANT CONTROL

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

1.2.1. Comprehensive Plan

The 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 complete Comprehensive Plan in 2008, and the Short Term Work Program Element in 2011. The Comprehensive Plan includes an implementation strategy that has objectives and policies related to natural resources protection. Those objectives and policies are as follows:

Main Objective: The City of Port Wentworth views the protection of natural and historic resources as a priority in order to achieve the community vision. The addition of open space throughout the community and identification of historic resources will enhance the quality of life for existing and future residents in the City. As development pressure continues to consume remaining tracks of land, it is important for the City to preserve the historic and ecological integrity of the City.

Policies for Natural Resource Protection (related to Stormwater):

- Minimize the impact new developments have on existing natural resources and undeveloped land.
- Continue to implement public awareness programs to encourage protection of natural resources.
- Participate in any countywide effort to identify and adopt protective land use measures to protect the water supply watershed
- Continue to participate fully in the National Flood Insurance Program
- Encourage design of new developments that incorporate openspace preservation.
- Encourage connectivity through sidewalks and trails between existing and new openspace, public spaces and buildings, and within and between residential developments.
- Support investment to improve or add parks and openspace.
- Support protection of sensitive habitats and natural features (coastal marshlands, floodplains, groundwater recharge zones, etc.).
- Continue to fully implement erosion and sedimentation control programs and stormwater management programs in accordance with State criteria.
- Support projects and programs that address increases in stormwater volume, velocity and pollutants caused by development.
- Support the implementation of Low Impact Development through implementation of the Green Growth Guidelines and the Coastal Stormwater Supplement of the Georgia Stormwater Management Manual.
- Comply with the requirements of the State Water & Wastewater Permitting Plan.

1.3. STREET, ROAD & HIGHWAY OPERATING PROCEDURES

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

1.3.1. Street Sweeping Program

To reduce polluted runoff originating from streets, roads, and highways from vehicle traffic, leaks and spills, and atmospheric deposition, the Public Works Department will sweep all City-owned curb and gutter roads on a monthly basis. This equates to approximately 10 miles of roadway swept monthly. Debris collected by the street sweeper is disposed at a local landfill. Records of street sweeping activities will be maintained by the City and submitted in the annual report.

1.3.2. Roadside Ditch Maintenance

Roadside ditches, in the City right-of-way (ROW), are considered part of the public MS4 and are inspected and maintained by the Public Works Department to ensure effective operation. Port Wentworth currently maintains 22.85 miles of roadside ditches.

- Right of ways are mowed quarterly during the growing season, and ditches are inspected at that time.
- Litter and debris is removed by the City crews prior to mowing and is 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.
- Roadside ditches are cleaned if accumulated sediment or other deposits exceed the design depth.

1.3.3. De-icing Procedures

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

1.3.4. Roadway Construction Erosion & Sedimentation Control

The Public Works department is responsible for ensuring that all minimum measure BMPs required by the Georgia Erosion and Sedimentation Act are implemented for Port Wentworth road construction projects where appropriate, in accordance with the requirements of the Georgia Erosion and Sedimentation Act (GESA).

1.4. FLOOD MANAGEMENT MEASURES

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

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

The City of Port Wentworth operates a Capital Improvement Program to address structural flood management and drainage issues within the City. 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 of 100% of drainage and flooding related CIPs, as funding becomes available for their implementation. This assessment will be integrated with the City's current Capital Improvement Program such that as identified CIPs are funded for implementation, an assessment will be performed during the design phase. The assessment must be completed before the design of any drainage CIP has been completed. The assessment will ensure that the drainage or flood-related CIP address the following:

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

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

1.5. MUNICIPAL LANDFILL & WASTE CONTROL FACILITY POLLUTANT MONITORING PROGRAMS

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

1.5.1. Municipal Waste Facilities

Port Wentworth does not currently own and operate any municipal waste facilities that are not subject to the NPDES Industrial General Permit (IGP). The City does operate a Wastewater Treatment Plant, and this site is covered by the IGP. The City has submitted a Notice of No Exposure for this site.

1.5.2. Municipal Facilities with the Potential to Cause Pollution

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

- Public Works
- Fire Department
- City Hall
- Mobley Park
- Police Department

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

- Areas around machinery and/or equipment
- Areas prone to leaks and spills
- Outdoor storage and handling areas

- Waste generation, storage, treatment and disposal areas
- Vehicle wash-down areas
- Fueling areas
- Loading and unloading areas

1.6. PESTICIDE, HERBICIDE, & FERTILIZER CONTROLS

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

1.6.1. Pesticide Applicator Certification Program

The City of 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 pesticides (herbicides and insecticides) to obtain and retain a "Commercial Pesticide Applicators License." The DoA also requires that distributors of restricted pesticides obtain and retain "Distributor Licenses." Continuing education units are required each year to maintain the license.

1.6.2. City Right-of Way Vegetation Maintenance Program

No herbicides will be used to maintain the City of Port Wentworth roadside ditches, canals, and right-of-ways. All vegetation maintenance will be performed manually or mechanically. Should City staff begin to use herbicides as part of the municipal right-of-way vegetation maintenance program, an herbicide-use standard operating procedure (SOP) will be developed and employees will be required to get the appropriate State Certification.

1.7. MUNICIPAL EMPLOYEE TRAINING

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

2. ILLICIT DISCHARGE DETECTION & ELIMINATION PROGRAMS

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

2.1. LEGAL AUTHORITY

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

2.1.1. Illicit Discharge Regulations

The City of Port Wentworth has established adequate legal authority through its Stormwater Management Ordinance to prohibit illicit discharges and conduct an illicit discharge detection and elimination program. This ordinance prohibits illicit discharges to the public MS4, grants the City 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.

2.1.2. Litter Regulations

The City of Port Wentworth has adopted and enforces a Nuisance Ordinance that prohibits the improper disposal of litter. This ordinance also provides Port Wentworth with the authority necessary to enforce compliance with the ordinance through fines.

2.2. DRY WEATHER SCREENING PROGRAM FOR ILLICIT DISCHARGE DETECTION

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

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

2.3. INVESTIGATIVE PROCEDURES FOR SUSPECTED ILLICIT DISCHARGES

CFR 122.26(d)(2)(iv)(B)(3): *A description of procedures to be followed to investigate portions of the separate storm sewer system that, based on the results of the field screen, or other appropriate information, indicate a reasonable potential of containing illicit discharges or other sources of non-storm water (such procedures may include: sampling procedures for constituents such as fecal coliform, fecal streptococcus, surfactants(MBAS), residual chlorine, fluorides and potassium; testing with fluorometric dyes; or conducting in storm sewer inspections where safety and other considerations allow. Such description shall include the location of storm sewers that have been identified for such evaluation);*

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

2.4. SPILL PREVENTION, CONTAINMENT & RESPONSE PROCEDURES

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

2.4.1. Hazardous Material Spill Containment & Response Procedures

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

2.4.2. Hazardous Material Record Keeping

All departments within the City of Port Wentworth are responsible for creating and updating an inventory of all hazardous materials stored or used on all appropriate publicly-owned sites. At a minimum the following information shall be recorded:

- Type of material
- Amount of material brought into the facility
- Amount currently being stored at the facility
- Amount currently being used at the facility
- Location within the facility where it is stored
- Hazards associated with material
- Intended use

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

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

2.5.1. Citizen Complaint Program

The City of Port Wentworth has established procedures for addressing citizen complaints about water quality and reports of illicit discharges/illegal dumping. City administrative staff is responsible for receiving citizen complaint calls, and using the caller's information to generate a work order. The work order is then passed to the Public Works Department, which is responsible for taking action to address calls that relate to water quality within two business days. The Public Works staff will record actions taken to address the complaint in the work order and 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 Enforcement Response Plan, to be completed in 2013.

2.5.2. Stormwater Management Webpage

The MPC administers a public education program on behalf of the City of Port Wentworth, which includes a website at www.mpcnaturalresources.org that provides information to promote, publicize and facilitate public reporting of illicit discharge. Port Wentworth provides a direct link at <http://www.cityofportwentworth.com/IllegalDumping.htm>, as well as contact information for citizens wishing to report illicit discharge or illegal dumping.

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

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

2.6.1. Recycle Rama

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

2.6.2. Household Hazardous Material Education Program

The Chatham Emergency Management Agency (CEMA) provides education to residents of the City on proper procedures to follow in the event of a HazMat spill/release. Those procedures are available to the public at the following weblink:

<http://www.chathamemergency.org/preparedness/hazardous-materials.php>. The Chatham County Local Emergency Planning Committee (LEPC) maintains an inventory of local sites that will accept waste oil, household hazardous materials and recyclables from the general public on their public education website at <http://www.lepc.com/recycle.htm>.

2.6.3. Recycling Program

The City of Port Wentworth operates a curbside recycling program for all City residents. Recyclables are picked up once a week when placed in specialized recycling bins, provided by the City, at each residence. The City advertises this program via the City website. The items collected by the City for recycling include:

- Plastics #1 and #2
- HDPE plastics
- Paper
- Steel cans
- Aluminum cans

2.6.4. Bulk Trash Pickup

The City of Port Wentworth operates a bi-monthly large appliance (white goods) pickup. Appliances are stripped for steel that is then recycled. Any materials that cannot be recycled are disposed of properly according to EPA regulations.

2.6.5. Dry Trash Pickup

The City of Port Wentworth operates a bi-weekly dry trash pick-up for residential properties within the City. The City will dispose properly of dry trash (leaves, branches, sticks, and other vegetated waste) in an inert landfill. This program is intended to prevent this waste from entering the MS4 and causing blockages or water quality issues.

2.7. CONTROLS LIMITING SANITARY SEWER INFILTRATION

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

2.7.1. Sanitary Sewer Inspection Program

The City of Port Wentworth currently implements an inspection program to determine if the sanitary sewer system has any leaks, damages, 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. The City's 13 lift stations are inspected daily, and citizen complaints regarding the sewer system are inspected immediately. Maintenance may include repair, relining, or replacement of malfunctioning system elements.

2.8. MUNICIPAL EMPLOYEE TRAINING

City employees will be trained during each reporting period (April 1st – March 31st) on illicit discharge detection and elimination procedures and programs on an annual basis. This training will include all municipal employees involved in IDDE activities. The City shall keep records of the training including the training agenda and or materials as well as a list of attendees for inclusion in the Annual Report. This training may be held in conjunction with other required training programs described in the SWMP.

3. WASTE HANDLING & INDUSTRIAL FACILITIES POLLUTION CONTROL PROGRAMS

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

3.1. PRIORITIES & PROCEDURES FOR INSPECTIONS & ESTABLISHMENT OF CONTROLS

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

3.1.1. Industrial Facility Inventory

The City of Port Wentworth has recently conducted an audit of its Industrial Inventory, as submitted to EPD in May 2012. Based on this audit, the City has determined that there are currently no industries within the jurisdictional boundaries of the City that have submitted for coverage under the NPDES IGP.

In the future, if any facilities located in Port Wentworth apply for coverage under the NPDES IGP, they will be included in the City's Industrial Facility Inventory and inspected according to the schedule and procedures established within this SWMP. Port Wentworth will submit any changes to the inventory in the following Annual Report. Once a facility(s), within the City limits has applied for coverage, it will be inspected in accordance with the schedule and procedures in the City's SWMP.

3.1.2. Industrial Stormwater Inspection Program

The City of Port Wentworth will conduct stormwater inspections on-site of industries on the industrial inventory list on an annual basis.

- Port Wentworth will check to ensure that the facility has submitted an NOI to be covered under the NPDES Industrial General Permit, if it is required.
- The City will perform a cursory review the general implementation status of the associated Stormwater Pollution Prevention Plan (SWP3).
- Should an inspection reveal a potential threat to water quality in the MS4, Port Wentworth staff will notify the industry or business, provide them with a copy of the inspection checklist, and perform a re-inspection to ensure that all necessary corrections were made.

- The City of Port Wentworth will also notify the EPD if assistance is needed for enforcement or if there is a threat to Waters of the State.
- Enforcement of any identified illicit discharges will be handled in accordance with the City’s Enforcement Response Plan, to be completed in May 2013.
- The City shall maintain records of inspections results, problems found, and actions taken. Documentation of these inspections will be submitted each year with the Annual Report. An inspection checklist is included in Appendix C.

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

Table 4: Port Wentworth Industrial Facility Inspection Schedule

Year	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
% Industrial Facilities Inspected Annually	10%	15%	20%	20%	20%

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

3.1.3. Industrial Facility Education Program

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

3.2. MONITORING PROGRAM FOR FACILITY DISCHARGE

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

3.2.1. Facility Monitoring Program

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

3.3. EMPLOYEE TRAINING PROGRAM

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

4. CONSTRUCTION SITE STRUCTURAL & NON-STRUCTURAL CONTROL PROGRAMS

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

The City of Port Wentworth currently not a Local Issuing Authority (LIA) for LDA Permits as defined by the Georgia Erosion and Sedimentation Act (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 Planning Procedures for Water Quality
- Structural and Non-Structural Best Management Practice Requirements
- Construction Site Priority Identification for Inspection
- Construction Site Operator Educational and Training Activities

5. HIGHLY VISIBLE POLLUTION SOURCES (HVPS)

5.1. HVPS FACILITY INVENTORY

The City maintains an inventory of commercial businesses and facilities that are considered to be HVPS. The City considers the following types of businesses to be HVPS:

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

The current inventory lists 50 facilities and is included in Appendix A. This inventory is updated annually based on changes to the business license database.

5.2. HVPS STORMWATER INSPECTION PROGRAM

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

Table 5: Port Wentworth HVPS Inspection Schedule

Year	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
% HVP Facilities Inspected Annually*	10%	15%	20%	20%	20%
Number of Facilities Inspected*	5	8	10	10	10

**The actual number of facilities to be inspected is based upon the most recent inventory of HVPS.*

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

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

5.3. EDUCATIONAL ACTIVITIES FOR HVPS

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

5.4. MUNICIPAL EMPLOYEE TRAINING PROGRAM

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

6. ENFORCEMENT RESPONSE PLAN (ERP)

6.1. ENFORCEMENT RESPONSE PLAN

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

7. IMPAIRED WATER BODIES

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

There are no 303 (d) listed stream segments within the jurisdictional boundaries of Port Wentworth.

7.1.1. TMDL Monitoring Plan

At this time no 303(d) listed streams located within the jurisdiction of Port Wentworth, thus no TMDL Monitoring Plan is required.

8. PUBLIC EDUCATION & INVOLVEMENT PROGRAMS

8.1. MPC COUNTYWIDE STORMWATER PUBLIC EDUCATION PROGRAM

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

8.1.1. MPC Natural Resources Website

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

- Erosion & Sedimentation Control/How to Conserve Natural Resources on Construction Sites Manual
- Green Infrastructure Practices/Coastal Stormwater Supplement
- Proper Disposal of Household Hazardous Waste
- Education on Illegal Dumping
- Contact number(s) to Report Water Quality Violations
- Proper application, storage, and disposal of landscape chemicals
- Tips on How to Prevent Stormwater Pollution
- Waterspout E-Newsletter Issues
- Stormwater Video/PSAs
- Educational Presentations on Stormwater Issues

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

8.1.2. Waterspout E-Newsletter

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

8.1.3. Stormwater Video/PSA

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

8.1.4. Septic System Education Program

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

8.2. MPC COUNTYWIDE PUBLIC INVOLVEMENT PROGRAM

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

8.2.1. Recycle-RAMA

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

8.2.2. Storm Drain Marking

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

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

8.2.2.A. Adopt-A-Stream

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

9. POST CONSTRUCTION

9.1. POST-CONSTRUCTION RUNOFF CONTROL REQUIREMENTS

9.1.1. Stormwater Management Ordinance

The City of Port Wentworth adopted the ordinance and design guidelines recommended by the Coastal Stormwater Supplement (CSS) and the Georgia Stormwater Management Manual (GSMM) in October 2009. The ordinance is included in Appendix D. Under this ordinance, and the referenced CSS design standards, developers must comply with the rules and regulations governing the development of post-development stormwater management plans for new development and redevelopment. The regulations require developers to submit a Stormwater Management Site Plan for all developments disturbing more than 1.0 acre of land or adding more than 5,000 sqft of impervious surface. Stormwater management plans must address water quality and water quantity issues in accordance with CSS recommendations. This ordinance encourages site design that incorporates green infrastructure and infiltration of stormwater to reduce stormwater runoff rates and volume. The Stormwater Management Site Plan must be reviewed by a Georgia-certified Professional Engineer and approved by the City before a Land Disturbing Activity (LDA) Permit is issued and construction can begin.

9.1.2. Design Criteria/Guidelines

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

9.1.3. Private Structural Control Maintenance Agreement

The City of Port Wentworth has adopted a Stormwater Management Ordinance that requires developers to enter into a “Stormwater Management Inspection and Maintenance Agreement and Plan” with the City to provide for the long-term, post-construction maintenance of all private stormwater controls on their site. As part of this agreement, the developer must identify the party to be responsible for maintenance, the maintenance activities required, and the schedule for performing maintenance. If future maintenance is not performed in accordance with the agreement, the City will have the right to enforce the ordinance, perform the maintenance, and recover the cost.

9.2. GREEN INFRASTRUCTURE/LOW IMPACT DEVELOPMENT

9.2.1. Legal Authority and Ordinance Review

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

9.2.2. GI/LID Plan

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

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

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