

Recertification Notice of Intent (NOI)

Regulated Small Municipal Separate Storm Sewer Systems (MS4's) General Permit ARR040000

You must complete, certify, and sign this Recertification Notice of Intent (NOI) form and return it along with the updated Stormwater Management Program (SWMP) to the Department in order to continue permit coverage under the General Permit ARR040000. You must submit this form no later than July 1, 2019. Please keep a copy of this form for your records once completed and signed.

Permittee Name	Permit Tracking Number	AFIN
City of Van Buren	ARR040002	88-00851

If any changes or additions need to be made to the information shown below, please update the new information in the corrections section below and/or attach documentation.

	Current Information in ADEQ's database	Corrections/Additions, If Needed
Small MS4 Physical Address	1003 Broadway	
County	Crawford	
Urbanized/Core Areas	Fort Smith, Arkansas-Oklahoma	
Receiving Stream	Arkansas River	
Ultimate Receiving Stream	Arkansas River	
Contact Person & Title	Joe Hurst, Public Works Director	David Martin
Telephone Number	(479) 471-5025	
Cognizant Official & Title	Robert D. Freeman, Mayor	Joseph P. Hurst, Mayor
Responsible Official & Title	Robert D. Freeman, Mayor	Joseph P. Hurst, Mayor

Are the mailing and invoice addresses the same?



Yes or No*

*If "No," please provide invoice address:

Additional Comments: _____

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

I certify that I have read and will comply with all the requirements of the Regulated Small Municipal Separate Storm Sewer Systems (MS4's) General Permit ARR040000.

Responsible Official Name: Joseph P. Hurst
Responsible Official Title: Mayor
Responsible Official Signature: *Joseph P. Hurst*
Date: 1/2/2019

Return the NOI form to the address below or send it electronically to: water.permit.application@adeq.state.ar.us or via ePortal at the following web address: <https://eportal.adeq.state.ar.us/>

NPDES Permits Section, Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

VAN BUREN STORMWATER MANAGEMENT PROGRAM (SWMP)

REVISED: APRIL 1, 2019

3.1. Requirements

3.1.1. The permittee shall develop, implement, and enforce a SWMP designed to reduce the discharge of pollutants from the small MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements and the Clean Water Act. The SWMP should include management practices; control techniques and system, design, and engineering methods; and shall be modified to include provisions as ADEQ determines appropriate after its review of the program for the control of such pollutants. The SWMP shall include the following information for each of the six minimum control measures described in Part 3.2 of this permit:

3.1.1.1. The best management practices (BMPs) that the MS4 or another entity will or already does implement for each of the stormwater minimum control measures;

1. Public Education and Outreach on Stormwater Impacts

An informational flyer is distributed twice each year with all City water bills. Van Buren has adopted a new storm sewer manhole cover design that provides a visual reminder that no dumping is allowed in the storm water system. A code enforcement door hanger (copy attached) is being distributed to educate residents concerning clean-up ordinances and penalties associated with non-compliance.

Information on stormwater pollution prevention is being added to the city website. A separate link will direct the public to Van Buren's construction standards as well as State of Arkansas permit requirements. The website will also include the new stormwater pollution prevention ordinance. A storm sewer map is being completed which shows the locations of all outfalls and the names and locations of all surface waters of the State that receive discharges from these outfalls. This map will be included on the website.

2. Public Involvement/Participation

Storm water ordinances and regulations receive a public hearing before the Planning Commission before adoption by the City Council. The city also has bi-annual citywide cleanups. The public is informed on stormwater pollution and then citizens go out into the city to clean up trash that could contaminate water. The City will document all public involvement including meetings and various activities.

3. Illicit Discharge Detection and Elimination

The storm sewer map is being developed in a Geographic Information System (GIS) using high resolution aerial photography and field surveys using GPS equipment. This storm sewer map will show the locations of all outfalls and the names and locations of all surface waters of the State that receive discharges from these outfalls.

Ordinance No. 14-2009 prohibits dumping in streets, alleys, gutters, ditches or storm drains. (copy attached)

Ordinance 2-2013 creates new stormwater pollution prevention regulations. This ordinance maintains and improves the quality of surface water and groundwater within the City, region, and state. (copy attached)

An annual report is generated that will record the number of illicit discharges and the number of illicit discharges that were eliminated.

Dry weather screening for outfalls are being scheduled for outfalls and these will be documented in order to confirm findings of the inspections.

4. Construction Site Stormwater Runoff Control

Ordinance No. 11-2004 was adopted 7/19/04 (copy attached). Ordinance No. 14-2009 provides for a \$50.00 to \$500.00 fine per violation. Single-family residence construction requires a minimum standards permit (copy attached). Multi-family residential, commercial and industrial projects must submit a project specific erosion control plan that is reviewed and approved by the Engineering Department.

Ordinance 2-2013 creates new stormwater pollution prevention regulations. This ordinance maintains and improves the quality of surface water and groundwater within the City, region, and state. (copy attached)

A documentation system through our building department is used to confirm that the applicable stormwater sites are being inspected on a monthly basis.

5. Post-Construction Stormwater Management in New Development and Redevelopment

Ordinance No. 2-2013 contains post-construction erosion control measures (copy attached). Ordinance 2-2013 creates new stormwater pollution prevention regulations. This ordinance maintains and improves the quality of surface water and groundwater within the City, region, and state.

Additionally, Van Buren enforces Minimum Drainage Standards for all subdivision construction (Ord. No. 40-1980)

The city is also creating a system to better document low impact development and green infrastructure waivers.

6. Pollution Prevention/Good Housekeeping for Municipal Operations

A stormwater system work order system was implemented during 2007. In 2007 Van Buren began a fall leaf pickup program to reduce the volume of yard waste entering the drainage system. The City purchased a street sweeper in 2008 and operates it full time to clean streets and reduce the volume of silt and trash entering the drainage system. All in-house and contract construction project comply with ADEQ and City storm water ordinances. All areas disturbed by construction activities are re-vegetated with seed and mulch or Bermuda sod. A yard waste/drainage maintenance department will be established effective Jan 1, 2010. The City has purchased a brush chipper and a sewer flusher to allowed improved stormwater system maintenance in 2010.

The City is developing an annual program that will train all employees with regard to reducing stormwater pollution from public facilities. Documentation will be maintained in order to confirm participation. All municipal facilities which are not required to obtain permit coverage shall have an implemented Storm Water Pollution Prevention Plan (SWPPP) and this is currently being developed.

- 3.1.1.2. The measurable goals for each of the BMPs, the ones the MS4 believes to have the authority to implement, including, as appropriate, the months and years in which the MS4 will undertake required actions, including interim milestones and the frequency of the action. At a minimum, measurable goals shall be implemented to satisfy this general permit's performance standards;

- *Van Buren believes it has implemented and met the requirements its stormwater permit.*

- 3.1.1.3. The person or persons, including position title or titles, or just the position title and contact information responsible for implementing or coordinating the BMPs for the SWMP. The SWMP shall include a Table of Organization, including a primary point of contact, which identifies how implementation across multiple positions, agencies and departments will occur, and;

- *The City's Public Works Director is responsible for implementing or coordinating the BMPs for control practice 6 of the SWMP (See Section 3.1.1.1 above).*
- *The City's Chief Building inspector is responsible for implementing or coordinating the BMPs for control practices 1, 2, 3, 4 and 5 of the SWMP (See Section 3.1.1.1 above).*

3.1.1.4. In addition to the requirements listed above, the permittee shall provide a rationale for how and why the permittee selected each of the BMPs and measurable goals for the SWMP. The MS4 shall develop and implement the program within five years of initially being granted Small MS4 general permit coverage. If an MS4 initially had coverage under a previous version of this permit, then the MS4 shall revise the program and its implementation to satisfy this general permit's performance standards within two years of when the MS4 coverage under this general permit was granted.

- *Public Workers Director determined that this seemed to be the quickest way to obtain full compliance.*

3.1.1.5. BMPs shall be reevaluated in situations where an MS4 discharges to an impaired waterbody where the evaluation of the impairment has determined the MS4 is a contributor to the impairment. The enhanced BMPs shall be specifically addressed within the SWMP.

- *Agreed.*

3.1.1.6. BMPs shall be reevaluated in situations where an MS4 discharges to a waterbody with an approved TMDL where the evaluation of the impairment has determined the MS4 is a contributor to the impairment. The enhanced BMPs shall be specifically addressed within the SWMP.

- *Agreed.*

3.2. Minimum Control Measures

3.2.1. Public Education and Outreach on Stormwater Impacts

3.2.1.2. **Decision process.** The permittee shall document the decision process for the development of a stormwater public education and outreach program. The rationale statement shall address both the overall public education program and the individual BMPs, measurable goals and responsible persons for the program. The rationale statement shall include the following information, at a minimum:

- 3.2.1.2.1. How the MS4 plans to inform individuals and households about the steps they can take to reduce stormwater pollution.

An informational flyer is distributed twice each year with all City water bills. Van Buren has adopted a new storm sewer manhole cover design that provides a visual reminder that no dumping is allowed in the storm water system. This informational flyer is being integrated into the City's website on a new page that will deal exclusively with stormwater pollution prevention.

- 3.2.1.2.2. How the MS4 plans to inform individuals and groups on how to become involved in the stormwater program (with activities such as local stream and beach restoration activities);

Newspaper articles run periodically that highlight various stormwater issues and waterway cleanup activities. Public notices are used to advertise meetings that will address stormwater issues and/or actions.

- 3.2.1.2.3. Who are the target audiences for the MS4s education program who are likely to have significant stormwater impacts (including commercial, industrial and institutional entities) and why those target audiences were selected;

Every household and business within the city limits is targeted through water bill flyers and print media.

- 3.2.1.2.4. What are the target pollutant sources the MS4 public education program is designed to address:

Residential yard waste, illegal dumping and construction site runoff are the primary pollutant sources that are being targeted.

- 3.2.1.2.5. What is the outreach strategy, including the mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) the MS4 will use to reach the target audiences, and how many people does the MS4 expect to reach by the outreach strategy over the permit term;

Every household and business within the city limits is targeted through water bill flyers and print media. The city's website is in the process of being utilized in order to reach a wider audience and inform them about MS4 public education.

- 3.2.1.2.6. Who (person or department) is responsible for overall management and implementation of the stormwater public education and outreach program and, if different, who is responsible for each of the BMPs identified for this program;

Van Buren Planning Department.

- 3.2.1.2.7. How will the MS4 evaluate the success of this minimum measure, including how the measurable goals were selected for each BMP.

Watch for visible reduction of pollutants in storm water. So far progress has been easily observed. An annual report has been generated that will record the number of illicit discharges and the number of illicit discharges that were eliminated.

- 3.2.1.3. **Performance Standards.** The stormwater public education and outreach program shall include more than one mechanism and target at least five different storm water themes or messages over the permit term. At a minimum, at least one theme or message shall be targeted to the land development community. For non-traditional MS4s, the land development community refers to landscaping and construction contractors working within its boundaries. The stormwater public education and outreach program shall reach at least 50 percent of the population over the permit term.

- 3.2.1.4. **Annual Reporting.** The annual report shall identify each mechanism used, including each stormwater theme, audience targeted and estimate of how many people were reached by each mechanism.

3.2.2. **Public Involvement/Participation**

- 3.2.2.2. **Decision process.** The permittee shall document the decision process for the development of a stormwater public involvement/participation program. The rationale statement shall address the overall public involvement/participation program and the individual BMPs, measurable goals, and responsible persons for the program. The rationale statement shall include the following information, at a minimum:

- 3.2.2.2.1. Has the permittee involved the public in the development and submittal of the NOI and SWMP description;

Storm water ordinances and regulations receive a series public hearings before the Planning Commission before adoption by the City Council. The public input to help shape community standards is welcomed at these meeting.

The City is also creating a page on the website that will inform the public about the NOP and the SWMP along with other stormwater practices.

- 3.2.2.2.2. What is the MS4's plan to actively involve the public in the development and implementation of the program;

Storm water ordinances and regulations receive a series of public hearings before the Planning Commission before adoption by the City Council. The public input to help shape community standards is welcomed at these meeting. The City

website is also being utilized in order to inform a wider range of citizens.

- 3.2.2.2.3. Who are the target audiences for the public involvement program, including a description of the types of ethnic and economic groups engaged. The MS4 is encouraged to actively involve all potentially affected stakeholder groups, including commercial and industrial businesses, trade associations, environmental groups, homeowners associations, and educational organizations, among others;

All Van Buren citizens have been welcomed to meetings to develop storm water ordinances.

- 3.2.2.2.4. What are the types of public involvement activities included in the program. Where appropriate, consider the following types of public involvement activities: citizen representatives on a stormwater management panel, public hearings, working with citizen volunteers willing to educate others about the program, volunteer monitoring or stream/beach clean-up activities;

Newspaper articles run periodically that highlight various stormwater issues and waterway cleanup activities. Public notices are used to advertise meetings that will address stormwater issues and/or actions.

- 3.2.2.2.5. Who (person or department) is responsible for the overall management and implementation of the stormwater public involvement/participation program and, if different, who is responsible for each of the BMPs identified for this program, and;

Van Buren Planning Department.

- 3.2.2.2.6. How the MS4 will evaluate the success of this minimum measure, including how the MS4 selected the measurable goals for each of the BMPs.

Watch level of public support for community involvement projects, watch for improved cleanliness of stream banks and watch for visible reduction of pollutants in storm water.

The city also is creating a system that will document that all stormwater sites are being inspected on a monthly basis.

- 3.2.2.3. **Performance Standards.** The stormwater public involvement/participation program shall include at least five public involvement activities over the permit term.

- 3.2.2.4. **Annual Reporting.** The annual report shall identify each public involvement/participation activity conducted, including a brief description of activity and include an estimate of how many people

participated.

3.2.3. Illicit Discharge Detection and Elimination

3.2.3.8 **Decision process.** The permittee shall document the decision process for the development of a stormwater illicit discharge detection and elimination program. The rationale statement shall address both the overall illicit discharge detection and elimination program and the individual BMPs, measurable goals, and responsible persons for the program. The rationale statement shall include the following information, at a minimum:

3.2.3.8.1. How the MS4 will develop a storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information was used for the maps, and the plan to verify the outfall locations with field surveys. If already completed, describe how the map was developed. Also, describe how the map will be regularly updated;

The storm sewer map has been developed in a Geographic Information System (GIS) using high resolution aerial photography and field surveys using GPS equipment. Hardcopy map is attached.

3.2.3.8.2. The mechanism (ordinance or other regulatory mechanism) the MS4 will use to effectively prohibit illicit discharges into the MS4 and why the MS4 chose that mechanism. If this mechanism needs to be developed, then describe in the plan and a schedule to do so. If an ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with the program;

Ordinance No. 14-2009 prohibits dumping in streets, alleys, gutters, ditches or storm drains. (copy attached)

Ordinance 2-2013 creates new stormwater pollution prevention regulations. This ordinance seeks to maintain and improve the quality of surface water and groundwater within the City, region, and state. This ordinance explicitly prohibits illicit discharges into the MS4. (copy attached)

3.2.3.8.3. The plan to ensure through appropriate enforcement procedures and actions that the illicit discharge ordinance (or other regulatory mechanism) is implemented;

Ordinance No. 14-2009 provides for a \$50.00 to \$500.00 fine per violation. (copy attached)

Ordinance 2-2013 creates new stormwater pollution prevention regulations. This ordinance seeks to maintain and improve the quality of surface water and groundwater within the City, region, and state. This ordinance explicitly prohibits illicit discharges into the MS4. It also includes a section about

enforcement and violation fines. (copy attached)

- 3.2.3.8.4. The plan to detect and address illicit discharges to the MS4 system, including discharges from illegal dumping and spills. The plan shall include dry weather field screening for non-stormwater flows and ADEQ recommends field tests of selected chemical parameters as indicators of discharge sources. The description shall address the following, at a minimum:

Inspection of 20 percent of the storm drain system outfalls per year will be conducted to identify non-storm water flows by the Street Department. After each year's inspection is complete, areas found to have suspicious discharges will be inspected further to detect suspected direct connections to the wastewater system and identify areas where wastewater might be leaking into adjacent storm drain pipes.

- 3.2.3.8.4.1. Procedures for locating priority areas which include areas with higher likelihood of illicit connections (e.g., areas with older sanitary sewer lines, for example) or ambient sampling to locate impacted reaches;

Van Buren Municipal Utilities inspects and monitors all sanitary sewer lines in the city and reports to the city Building Department, Inspector's office, if any issues occur. The city street department inspects and monitors yearly all city storm water systems for illicit occurrences.

- 3.2.3.8.4.2. Procedures for tracing the source of an illicit discharge, including the specific techniques that will be used to detect the location of the source;

Will use storm drain maps to trace discharge upstream to source.

- 3.2.3.8.4.3. Procedures for removing the source of the illicit discharge; and

Enforce compliance with Ordinance No. 14-2009 which prohibits dumping in streets, alleys, gutters, ditches or storm drains. (copy attached)

Enforce compliance with Ordinance 2-2013.

- 3.2.3.8.4.4. Procedures for program evaluation and assessment.

Visual monitoring for illicit discharges in storm water

- 3.2.3.8.5. How the MS4 plans to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. Include in the description how this plan will coordinate with the public education minimum measure and the pollution prevention/good housekeeping minimum measure programs;

An informational flyer is distributed annually with all City water bills. Van Buren has adopted a storm sewer manhole cover design that provides a visual reminder that no dumping is allowed in the storm water system.

The City is developing an annual program that will train all employees with regard to reducing stormwater pollution from public facilities.

- 3.2.3.8.6. Who is responsible for overall management and implementation of the stormwater illicit discharge detection and elimination program and, if different, who is responsible for each of the BMPs identified for this program, and;

Van Buren Planning Department

- 3.2.3.8.7. How the MS4 will evaluate the success of this minimum measure, including how the MS4 selected the measurable goals for each of the BMPs.

Watch level of public support for community involvement projects, watch for improved cleanliness of stream banks and watch for visible reduction of pollutants in storm water. So far progress has been easily observed.

- 3.2.3.10. **Performance Standards.** The stormwater illicit discharge detection and elimination program shall include dry-weather screening of all stormwater outfalls located in the MS4's urbanized area at the time of this permit coverage over the permit term. Only those outfalls draining undeveloped watersheds do not need to be screened for illicit discharges. The storm sewer system map shall be updated annually as needed for changes occurring in the urbanized area boundaries at the time of permit coverage.

- 3.2.3.11. **Annual Reporting.** The annual report shall document the following: (1)number of outfalls dry-weather screened, (2)number of dry-weather flows identified, (3)number of illicit discharges identified, (4)number of illicit discharges eliminated, (5)provide schedules for elimination of illicit connections that have been identified but have yet to be eliminated and (6)summary of any storm sewer system mapping updates.

3.2.4. Construction Site Stormwater Runoff Control

- 3.2.4.2. **Decision process.** The permittee shall document the decision process for the development of a construction site stormwater control program. The rationale statement shall address the overall construction site stormwater control program and the individual BMPs, measurable goals, and responsible persons for the program. The rationale statement shall include the following information, at a minimum:

- 3.2.4.2.1. The mechanism (ordinance or other regulatory mechanism) that will be used to

require erosion and sediment controls at construction sites and why the MS4 chose that mechanism. If it is needed to develop this mechanism, describe the plan and a schedule to do so. If the ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with the SWMP description;

Ordinance No. 2-2013 deals directly with this.

- 3.2.4.2.2. The plan to ensure compliance with the erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms that will be used to ensure compliance. Describe the procedures for when certain sanctions will be used. Possible sanctions include non-monetary penalties (such as a stop work orders), fines, bonding requirements, and/or permit denials for non-compliance;

Ordinance No. 11-2004 provides for Stop-work orders, permit revocation and a \$250.00 per day fine. (copy attached)

Ordinance No. 2-2013 also includes enforcement and violation procedures.

- 3.2.4.2.3. The requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites that may cause adverse impacts to water quality. Such waste includes discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste;

Ordinance No. 14-2009 prohibits dumping in streets, alleys, gutters, ditches or storm drains. (copy attached)

Ordinance 2-2013 creates new stormwater pollution prevention regulations. This ordinance seeks to maintain and improve the quality of surface water and groundwater within the City, region, and state. This ordinance explicitly prohibits illicit discharges into the MS4. (copy attached)

- 3.2.4.2.4. The procedures for site plan review, including the review of pre-construction site plans, which incorporate consideration of potential water quality impacts. Describe the procedures and the rationale for how certain sites will be identified for site plan review, if not all plans are reviewed. Describe the estimated number and percentage of sites that will have pre-construction site plans reviewed;

Single-family residence construction requires a minimum standards permit (copy attached). Multi-family residential, commercial and industrial projects must submit a project specific erosion control plan that is reviewed and approved by the Engineering Department.

- 3.2.4.2.5. The procedures for receipt and consideration of information submitted by the public. Consider coordinating this requirement with the public education program;

Public input is received by the Mayor's office and referred to the appropriate department, board or commission for appropriate action.

- 3.2.4.2.6. The procedures for site inspection and enforcement of control measures, including how sites are prioritized for inspection;

Ordinance No. 2-2013 contains control measures (copy attached). All sites are inspected by the building inspector periodically throughout duration of construction. No occupancy certificate can be issued for buildings with non-compliant erosion control conditions. Code enforcement issues citations to non-compliant contractors.

- 3.2.4.2.7. Who is responsible for overall management and implementation of the construction site stormwater control program and, if different, who is responsible for each of the BMPs identified for this program; and

Van Buren Building Department

- 3.2.4.2.8. Describe how the MS4 will evaluate the success of this minimum measure, including how the measurable goals were selected for each of the BMPs.

Watch for improvement in construction site erosion control practices.

- 3.2.4.3. **Performance Standards.** The construction site stormwater control program shall include pre-construction site plan reviews (reviews of construction site Stormwater Pollution Prevention Plans) of 100 percent of projects from construction activities that result in a land disturbance of greater than or equal to one acre. These applicable sites shall be inspected at least on a monthly basis to ensure compliance.

- 3.2.4.4. **Annual Reporting.** The annual report shall document the following: (1)number of applicable sites in the MS4's jurisdiction, (2)number of pre-construction site plan reviews performed, (3)number and frequency of site inspections, (4)number of violation letters issued, (5)number of enforcement actions taken and (6)number of complaints received and number followed up on.

3.2.5. Post-Construction Stormwater Management in New Development and Redevelopment

- 3.2.5.5. **Decision process.** The permittee shall document the decision process for the development of a post-construction SWMP. The rationale statement shall

address both the overall post-construction SWMP and the individual BMPs, measurable goals, and responsible persons for the program. The rationale statement shall include the following information, at a minimum:

- 3.2.5.5.1. The program to address stormwater runoff from new development and redevelopment projects. Include in this description any specific priority areas for this program.

Ordinance No. 2-2013 contains post-construction erosion control measures (copy attached). Additionally, Van Buren enforces Minimum Drainage Standards for all subdivision construction (Ord. No. 40-1980). Ordinance No. 11-2004 and 40-1980 are available on the Van Buren website at <http://www.vanburencity.org/LandDevelopment/>. Ordinance No. 2-2013 is being integrated into a new webpage on the city website that will deal exclusively with stormwater pollution prevention.

- 3.2.5.5.2. How the program will be specifically tailored for a local community, minimize water quality impacts, and attempt to maintain pre-development runoff conditions.

Ordinance No. 2-2013 contains post-construction erosion control measures (copy attached). Additionally, Van Buren enforces Minimum Drainage Standards for all subdivision construction (Ord. No. 40-1980)

- 3.2.5.5.3. Any non-structural BMPs in the program, including, as appropriate: policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; policies or ordinances that encourage infill development in higher density urban areas, and areas with existing storm sewer infrastructure; education programs for developers and the public about project designs that minimize water quality impacts; and other measures such as minimization of the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, and source control measures often thought of as good housekeeping, preventive maintenance and spill prevention.

Ordinance No. 2-2013 contains post-construction erosion control measures (copy attached). Additionally, Van Buren enforces Minimum Drainage Standards for all subdivision construction (Ord. No. 40-1980)

- 3.2.5.5.4. Any structural BMPs in the program, including, as appropriate: storage practices such as wet ponds and extended-detention outlet structures; filtration practices such as grassed swales, bio-retention cells, sand filters and filter

strips; and infiltration practices such as infiltration basins and infiltration trenches.

Ordinance No. 2-2013 contains post-construction erosion control measures (copy attached). Additionally, Van Buren enforces Minimum Drainage Standards for all subdivision construction (Ord. No. 40-1980)

- 3.2.5.5.5. The mechanisms (ordinance or other regulatory mechanisms) used to address post-construction runoff from new developments and redevelopments and why they were chosen. If a mechanism needs to be developed, then describe a plan and a schedule to do so. If an ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with the program.

Ordinance No. 2-2013 contains post-construction erosion control measures (copy attached). Additionally, Van Buren enforces Minimum Drainage Standards for all subdivision construction (Ord. No. 40-1980)

- 3.2.5.5.6. How the permittee will ensure the long-term operation and maintenance (O&M) of the selected BMPs. Options to help ensure that future O&M responsibilities are clearly identified include an agreement between the permittee and another party such as the post-development landowners or regional authorities.

The City of Van Buren Street Department assumes responsibility for O&M stormwater improvements.

- 3.2.5.5.7. Who is responsible for overall management and implementation of the post-construction SWMP and, if different, who is responsible for each of the BMPs identified for this program.

Van Buren Building Department

- 3.2.5.5.8. How the MS4 will evaluate the success of this minimum measure, including how the MS4 selected the measurable goals for each of the BMPs.

Visual inspection for reduction of pollutants in storm water

- 3.2.5.6. **Performance Standards.** The post-construction SWMP shall include pre-construction site plan review (for compliance with local requirements for post-construction management of stormwater) of 100 percent of projects from construction activities that result in a land disturbance of greater than or equal to one acre to ensure that required controls are designed per requirements. These applicable sites shall be inspected to ensure that controls are installed per requirements. The program shall also ensure that long-term operation and maintenance (O&M) plans are developed and agreements in place for all applicable sites.

- 3.2.5.7. **Annual Reporting.** The MS4 annual reports shall document the following: (1) number of applicable sites in the jurisdiction requiring post-construction controls, (2) number of pre-construction site plan reviews performed, (3) number of inspections performed to ensure as built per requirements, (4) compliance rates with MS4 requirements, and (5) number of long-term operation and maintenance (O&M) plans developed and agreements in place.
- 3.2.5.8. **Low Impact Development.** ADEQ recommends MS4s to evaluate their existing codes and planning procedures to remove impediments to low impact development and green infrastructure. ADEQ also encourages municipalities to evaluate proposed developments using green infrastructure for waivers from local requirements in their community planning process. You must include information on efforts to identify and remove impediments to LID in the post-construction program element of the Annual Report covering the 4th year of the permit.

3.2.6. Pollution Prevention/Good Housekeeping for Municipal Operations

- 3.2.6.3. **Decision process.** The permittee shall document the decision process for the development of a pollution prevention/good housekeeping program for municipal operations. The rationale statement shall address both the overall pollution prevention/good housekeeping program and the individual BMPs, measurable goals, and responsible persons for the program. The rationale statement shall include the following information, at a minimum:
- 3.2.6.3.1. The operation and maintenance program to prevent or reduce pollutant runoff from the municipal operations. The program shall specifically list the municipal operations that are impacted by this operation and maintenance program.
- City street and storm drain maintenance operations.*
- 3.2.6.3.2. Any government employee training program that will be used to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. Describe any existing, available materials planned for use. Describe how this training program will be coordinated with the outreach programs developed for the public information minimum measure and the illicit discharge minimum measure.
- Stormwater training is incorporated into normal safety training sessions for Street Department employees.*
- 3.2.6.3.3. The program description shall specifically address the following areas:

- 3.2.6.3.3.1. Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to the MS4.

A stormwater system work order system was implemented during 2007. In 2007 Van Buren began a fall leaf pickup program to reduce the volume of yard waste entering the drainage system. The City purchased a street sweeper in 2008 and operates it full time to clean streets and reduce the volume of silt and trash entering the drainage system. All in-house and contract construction project comply with ADEQ and City storm water ordinances. All areas disturbed by construction activities are re-vegetated with seed and mulch or Bermuda sod. A yard waste/drainage maintenance department will be established effective Jan 1, 2010. The City has purchased a brush chipper and a sewer flusher to allowed improved stormwater system maintenance in 2010.

- 3.2.6.3.3.2. Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas the permittee operates.

Ordinance No. 14-2009 prohibits dumping in streets, alleys, gutters, ditches or storm drains. (copy attached). Ordinance 2-2013 creates new stormwater pollution prevention regulations. This ordinance seeks to maintain and improve the quality of surface water and groundwater within the City, region, and state. This ordinance explicitly prohibits illicit discharges into the MS4. (copy attached)

A stormwater system work order system was implemented during 2007. In 2007 Van Buren began a fall leaf pickup program to reduce the volume of yard waste entering the drainage system. The City purchased a street sweeper in 2008 and operates it full time to clean streets and reduce the volume of silt and trash entering the drainage system. All in-house and contract construction project comply with ADEQ and City storm water ordinances. All areas disturbed by construction activities are re-vegetated with seed and mulch or Bermuda sod. A yard waste/drainage maintenance department will be established effective Jan 1, 2010. The City has purchased a brush chipper and a sewer flusher to allowed improved stormwater system maintenance in 2010.

- 3.2.6.3.3.3. Procedures for the proper disposal of waste removed from the MS4 and the municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris.

Waste generated by street sweeping operations are placed in a properly monitored construction fill site.

- 3.2.6.3.3.4. Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for

incorporation of additional water quality protection devices or practices.

All flood management projects are reviewed by the Van Buren Engineering Department and Floodplain Administrator.

- 3.2.6.3.4. Who is responsible for overall management and implementation of the pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program.

Van Buren Street Department

- 3.2.6.3.5. How will the MS4 evaluate the success of this minimum measure, including how the MS4 selected the measurable goals for each of the BMPs.

Visible inspection for reduction of pollutants in storm water

- 3.2.6.4. **Performance Standards.** The pollution prevention/good housekeeping program shall include, at a minimum, an annual employee training for all eligible employees. An eligible employee is a new or veteran employee whose day-to-day work activities have the potential to impact stormwater quality. MS4s shall evaluate all current municipal-owned facilities to ensure that industrial general stormwater permit coverage (ARR000000), if needed, is obtained. This evaluation shall be included in the first annual report. Annual inspections for all municipal facilities not requiring industrial stormwater permit coverage are required for municipal facilities performing maintenance activities on mechanical equipment, facilities with fueling stations, facilities involved in waste storage, transfer or recycling, facilities with material stockpiles, and facilities storing fertilizers or pesticides. The operation and maintenance program shall include appropriate procedures, controls, maintenance schedules and recordkeeping to address Part 3.2.6.3.3 of this permit.

- 3.2.6.5. **Annual Reporting.** The annual reports shall document the following: (1) summary of employee training program(s) implemented with number of employees that attended and (2) summary of activities and procedures implemented for the operation and maintenance program.