

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 Elkins	ARR040006	88-00834

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	1874 Stokenbury Road	
County	Washington	
Urbanized/Core Areas	Fayetteville-Springdale-Rogers	
Receiving Stream	White River	
Ultimate Receiving Stream	White River	
Contact Person & Title	Bruce Ledford, Mayor	
Telephone Number	(479) 643-3696	
Cognizant Official & Title	Bruce Ledford, Mayor	
Responsible Official & Title	Bruce Ledford, 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: Bruce Ledford
Responsible Official Title: Mayor
Responsible Official Signature: Bruce Ledford
Date: 4/25/19

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/>

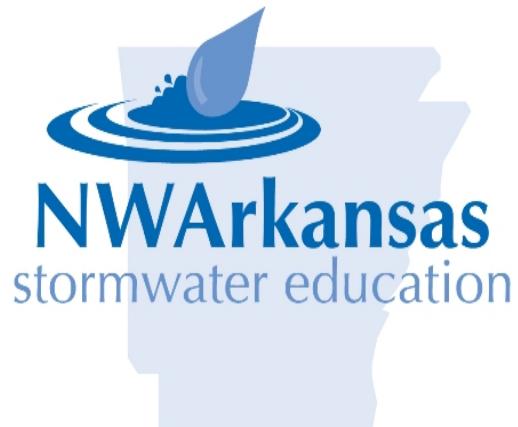
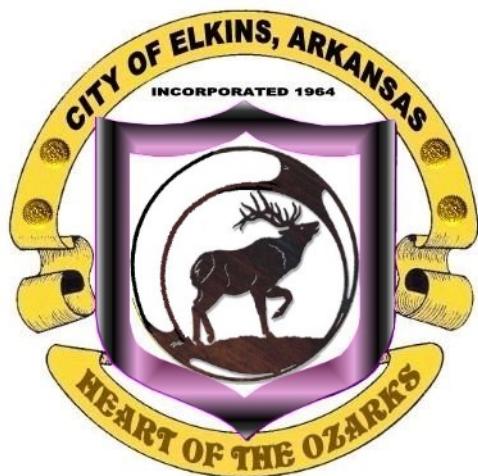
NPDES Permits Section, Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

City of Elkins STORMWATER MANAGEMENT PLAN

Prepared by:
City of Elkins

Planning and Community Development Department

July 2019



City of Elkins

Permit ARR 040006

CITY OF ELKINS

STORMWATER MANAGEMENT PROGRAM

Background and Context

The Elkins Stormwater Management Program (Stormwater Plan) has been developed to provide policy and management guidance for activities affecting stormwater for the MS4 portion of the City of Elkins. It is intended to help the City fulfill certain State and Federal water quality requirements, and to meet local water resources management objectives. Through the implementation of the policies and management practices embodied in the Stormwater Plan over time, Elkins hopes to preserve urban stormwater quality and to develop and preserve the urban drainage infrastructure in a manner that meets the community's needs for years to come.

While the State and Federal regulatory programs place significant emphasis on improving water quality and the health of Arkansas's watersheds, Elkins, as part of the Beaver Reservoir further emphasizes the need for local management of urban stormwater and waterways. It becomes even more important that management of these resources occur in a manner that minimizes destructive long-term impacts on drainage infrastructure and the natural features that help protect water quality and control flooding.

Description of the Permit Area

The City of Elkins currently serves a population of 1,992 people (2010) within the MS4 area. The City has complete authority and responsibility for planning, building, operating, maintaining and regulating the stormwater drainage system within the city limits. Therefore, the MS4 NPDES permit for which this MS4 plan is submitted covers only the area within the MS4 area. The area includes the White River and it's tributary streams. The City's stormwater management practices have evolved to include efficient and cost-effective approaches that reduce or eliminate stormwater pollution and protect the riparian (stream bank) areas of open waterways. These approaches provide natural pollutant removal and stormwater management capacity. However, the City has never before had a Stormwater Plan intended to provide comprehensive stormwater management guidance for the City organization. The City's stormwater master plan address the City's current jurisdiction, and address system capacity. In 2003-2004, the Elkins Planning Department began to review the Federal and State regulatory programs, with which the City must comply. In 2007, the City Council endorsed the proposed addition of Chapter 10.30 to the City Ordinances and the desired long-term outcomes that have served as a guide for the City's efforts to develop this Stormwater Plan and other related water resources management efforts.

Purpose, Scope, and Areas of Focus

The purposes of the Stormwater Plan are threefold. First, the Stormwater Plan characterizes The City's MS4 area stormwater drainage system, including both the open and piped systems, their connections to the streams, and the overall condition of the system. This characterization is necessary to address relevant State and Federal regulatory requirements and it provides baseline information on which to develop focused stormwater management strategies.

Second, the Stormwater Plan establishes goals, policies, and implementation actions that will achieve the City's long-term objectives in a way that is understandable to the public, usable by City staff, and meets regulatory needs. Finally, the Stormwater Plan establishes a means for measuring, reporting, and adaptively managing the City's water resources, by presenting benchmarks that will ensure meaningful progress, as well as ensuring compliance with applicable laws and permit requirements.

Scope and Areas of Focus:

The Stormwater Plan addresses stormwater quality management policies and management practices that are, and/or will be implemented in the City. The scope of the Stormwater Plan is determined primarily by the Federal MS4 permit requirements but is intended to address local water resources issues as well. These areas of focus in the Stormwater Plan include:

Pollution incidents and unlawful (illicit) discharges to the City's stormwater drainage system. These discharges can be systematic (recurring) or episodic (occasional or one-time) discharges and include pollutant runoff from parking lots, discharges from industrial outfalls, accidental spills, poor construction site management, and a variety of ways people dump pollutants into street gutters or catch basins.

On-site management of stormwater to reduce the quantity of stormwater and pollution entering the drainage system. Similar to illicit discharges, events that cause flooding, system surcharges, or ongoing pollutant loading can occur downstream from the city limits, and originate from a variety of causes. These include inadequacies in the type and design of infrastructure, inadequate maintenance, insufficient erosion and/or sediment control practices, and increases in an impervious area without provision for on-site infiltration of stormwater into the ground. The City regulates these issues through the implementation of the Elkins Municipal Code within the city limits.

Reduction and prevention of pollution at City facilities and resulting from City activities and business practices. The City provides services with a potential for creating water pollution, erosion, and sedimentation. These include field activities such as ditch cleaning and excavation/maintenance activities, as well as activities at City facilities, such as vehicle washing and maintenance, painting, and material handling. The Federal NPDES Stormwater Program requires the City to implement pollution prevention practices that reduce or eliminate stormwater pollution from City activities. Beyond this regulatory motivation, it is important that the City lead by example in areas where similar practices and behaviors from citizens and businesses are required.

Public education geared toward broad community stewardship of water resources. The Federal NPDES Stormwater Program places significant emphasis on public education as part of the long-term solution to stormwater pollution. As such, education is a required element of the Stormwater Plan. The long-term success of the City's efforts will hinge on increased awareness and stewardship throughout the community.

The Stormwater Plan will result in formal, organized educational and outreach efforts that are targeted broadly throughout the metropolitan area. Many of these efforts are most effectively approached on a Northwest Arkansas MS4 plan, through cooperative efforts with the University of Arkansas Extension Service.

Public awareness and involvement in the City's Stormwater management program. Broad awareness and participation in the development and implementation of the Stormwater Plan by residents and local area businesses is a key component to ensure the effectiveness of the Stormwater Plan. The Stormwater Plan includes a public involvement component in its development that meets the Federal NPDES program.

Targeted capital improvements and maintenance programs to improve water quality and restore high priority areas. Concurrent with the development of the Stormwater Plan, the City continues to prepare a Stormwater Master Plan, which will update the City's needs assessment and Capital Improvement Program (CIP) for future drainage infrastructure.

ADEQ-required Municipal Separate Storm Sewer System (MS4) Plan elements. The NPDES Stormwater Program requires that the City submit an MS4 plan in order to acquire an MS4 permit to legally discharge stormwater to the waters of the U.S.

The Federal rules and, therefore, ADEQ's permit requirements, direct that the City's MS4 plan

address six minimum areas, which are termed “Minimum Control Measures.” These areas are broadly titled in the rules as follows:

Public Education and Outreach on Stormwater Impacts;

Public Involvement/Participation;

Illicit Discharges Detection and Elimination;

Construction Site Stormwater Runoff Control;

Post-Construction Stormwater Management for New Development and Redevelopment;

Pollution Prevention in Municipal Operations;

Overview of Elkins Stormwater Drainage Systems

The City is responsible for implementing surface water management activities within its MS4 boundaries, including the planning, design, construction, operation, and maintenance of the stormwater drainage system. The City performs all operation and maintenance on the public drainage system that is designed and constructed to City standards and located within easements or rights-of-way or real property that has been conveyed or dedicated to the City. The City also maintains open channels throughout the city and public outfalls to natural streams within the City’s jurisdiction.

Stormwater Drainage Basin Characterization

The City’s stormwater drainage system has one major drainage, the White River. The City is further broken down into several separate tributaries to this stream. A drainage basin can be described as a geographic area within which stormwater drains from many small systems converge on a larger drainage way, ultimately culminating in outfalls to the major drainage way. The character and condition of the drainage way may vary significantly throughout the basins, depending on surrounding land uses and contributing drainages.

Goals

The goals of Elkins Stormwater Management Program (SWMP) is to 1) reduce the discharge of pollutants from the MS4 area to the maximum extent practicable (MEP) and 2) satisfy the appropriate water quality requirements of the Arkansas Department of Environmental Quality and the Clean Water Act.

Term of the SWMP

The SWMP shall cover the term of the permit, reviewed annually, and updated as necessary, or as required by Environmental Affairs Director.

Implementation

Implementation of the revised and updates SWMP may be achieved through participation with other permittees, public agencies or private entities in corporative efforts to satisfy the requirements of Part 3 of the permit.

Total Maximum Daily Load

The City of Elkins does not have any water bodies with an associated TMDL.

SWMP Resources

The City of Elkins shall provide adequate finances, staff, equipment, and support capabilities to implement their activities under the SWMP to the maximum extent practicable (MEP).

Discharge Goals

The following goals are established for discharges from the Northwest Arkansas MS4:

- No discharge of toxic in toxic amounts
- No discharge of pollutants in quantities that would cause a violation of the Arkansas Water Quality Standards
- No discharge of floatable debris, oils, scum, foam, or grease in other than trace amounts
- No discharge of non-storm water from the MS4 (except as provided in Permit)
- No discharge of sediment from construction activities into MS4

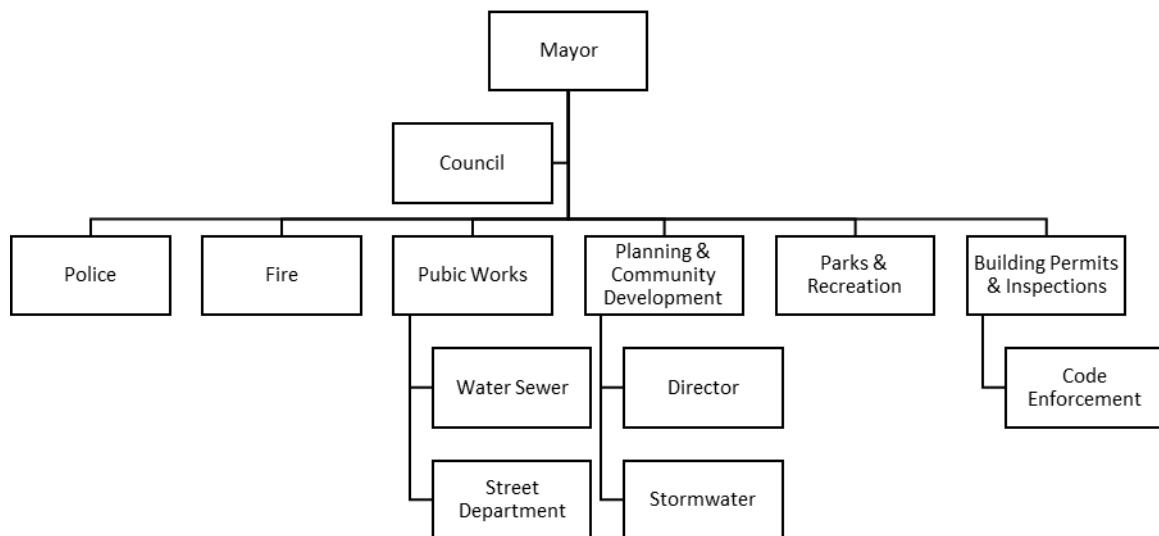
Elkins NPDES Stormwater Plan

City Stormwater Management Program - Responsible Parties:

The City is responsible for implementing surface water management activities within its boundaries, including the planning, design, construction, operation, and maintenance of the stormwater drainage system. In response to the NPDES Phase II stormwater requirements, the City has developed an MS4 plan addressing each of the six required Minimum Control Measures, as specified in the Federal-NPDES Phase II rules. The City's stormwater management program is the responsibility of the Planning Director.

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City Organization Chart



Minimum Control Measure #1:

Public Education and Outreach on Stormwater Impacts

Decision Process

The NWA Stormwater Compliance Group meets to discuss stormwater pollution prevention and provide input on education activities. The NWA Stormwater Education Steering committee (public membership comprised of diverse backgrounds/interests) convenes at least once each year to review and evaluate program accomplishments and plan next steps. Both groups provide the localized input used to identify critical stormwater pollutants, education needs, target audiences, program methods, and public relations strategies.

Public Education/Outreach BMPs

Develop and distribute educational materials

Input from both the MS4 Stormwater Compliance Group and Education Steering Committee guides the emphases of electronic and printed educational materials. Once topics are identified, materials will be developed, adapted, and/or gathered for distribution at public meetings, in support of presentations, and with educational displays. Examples may include fact sheets, videos, social media content, website content, newsletters, press releases, and PSAs.

Measurable Goals:

Mechanism types and numbers of educational materials will be documented.

Develop 5 educational materials across the permit term.

Attendance of MS4 Stormwater Compliance Group and Education Steering Committee meetings will be documented.

Conduct stormwater education activities

Educational presentations will be given to illustrate stormwater dynamics, identify potential pollutants and pathways, describe techniques to reduce stormwater pollution and encourage voluntary BMP implementation according to the annual topic/audience emphases outlined in the following table.

Measurable Goal:

Stormwater education programs will be conducted and documented.

Responsible Party

The Northwest Arkansas Regional Planning Commission and the University of Arkansas Cooperative Extension Service have contracted with the municipality to be responsible for the development and implementation of the public education efforts. A copy of that agreement is included in this plan.

Performance Standard:

Urban stormwater outreach/education programs will reach at least 50% of the urbanized area population.

Minimum Control Measure #1:

5 Year Implementation Schedule

2020	2021	2022	2023	2024
<i>Topic Emphases:</i> Storm drain awareness/dumping	<i>Topic Emphasis:</i> Litter	<i>Topic Emphasis:</i> Sediment control	<i>Topic Emphasis:</i> Yard waste	<i>Topic Emphasis:</i> Automotive maintenance and Household Hazardous Waste (HHW)
<i>Target Audience:</i> General public	<i>Target Audience:</i> General public	<i>Target Audience:</i> Land development community	<i>Target Audience:</i> The general public and green industry	<i>Target Audience:</i> The general public and vehicle owners
<i>Rationale:</i> Pollutants entering the storm drain system degrade water quality	<i>Rationale:</i> Improper handling and disposal of litter can allow it to enter the storm drain system and degrade water quality	<i>Rationale:</i> Sediment leaving construction sites can enter the storm drain system and degrade water quality	<i>Rationale:</i> Improper yard waste disposal can clog drainage ways and excess fertilizer and pesticide applications can enter the storm drain system and degrade water quality	<i>Rationale:</i> Improper vehicle maintenance and HHW disposal can allow pollutants to enter the storm drain system and degrade water quality

Minimum Control Measure #2: Public Involvement/Participation

Decision Process

The NWA Stormwater Compliance Group meets to discuss stormwater pollution prevention and provide input on education activities. The NWA Stormwater Education Steering committee (public membership comprised of diverse backgrounds/interests) convenes at least once each year to review and evaluate program accomplishments and plan next steps. Both groups provide the localized input used to identify critical stormwater pollutants, education needs, target audiences, program methods, and public relations strategies.

Target Audience

The audience for public involvement programs and activities will be the general public and may include businesses, trade associations, environmental groups, homeowners, and civic organizations.

Public Involvement/Participation BMPs

Engage Residents in Public Participation/Involvement Activities

Input from both the MS4 Stormwater Compliance Group and Education Steering Committee guides the emphases of educational materials, educational programs, and public involvement efforts. Residents will participate in public involvement activities. Examples may include stormwater compliance meetings, stormwater steering meetings, cleanups, etc.

Measurable Goal:

Public participation activities will be documented.

Responsible Party

The Northwest Arkansas Regional Planning Commission and the University of Arkansas Cooperative Extension Service have contracted with the municipality to be responsible for the development and implementation of the public involvement efforts. A copy of that agreement is included in this plan.

Performance Standard

At least 5 public participation and involvement activities will be coordinated over the permit term.

Minimum Control Measure #3: Illicit Discharges Detection and Elimination

Applicable City of Elkins BMPs

Illicit Discharge Detection and Elimination (IDDE):

IDDE1 -- Illicit Discharges Reporting and Tracking System

IDDE2 -- Illicit Discharges Response and Enforcement

IDDE3 -- Citywide Illicit Discharge Detection and Elimination

IDDE4 -- Non-Stormwater Discharge Assessment

Rationale

Elkins selected the above four BMPs to address this requirement. BMPs IDDE1 and IDDE2 describe the City's processes that respond to and document complaints regarding water quality, including illicit discharges. IDDE1, reporting, and tracking have several methods of presumed illicit spills, sightings and discharges to be reported. Most of the City department's personnel, while doing their daily jobs will report potential illicit problem areas to the Planning Director. The problem area will be investigated soon or immediately depending on the situation. Minor infractions will be brought to the owner's attention, followed up on, and an investigation report will be included in the Illicit Complaint files complete with pictures and the investigation results. Larger incidents with water bodies such as fish kill with unknown circumstances will be reported to State Fish and Wildlife and/or the ADEQ for their expertise and water quality measurement capabilities. These two BMPs include a phone number for complaints and protocols for the most efficient and effective follow-up actions in response to calls. BMP IDDE4 includes the monitoring program conducted by the City to identify and track the sources of illicit discharges. The City's program to prohibit and enforce elimination of illicit discharges are described under BMP IDDE2. Inform the public regarding the hazards of illicit discharges is implemented through several of the public education BMPs such as Clean Water into Storm Curb Drain and Door Hangers. Addressing non-stormwater discharges will require that the City assess these discharges, and determine if they adversely impact the stormwater system. If they are found to cause an adverse impact, appropriate management practices or regulations will be used or developed and implemented. Public knowledge of phone numbers of City Hall and Police Dispatch. Complaint phoned in regarding an incident are forwarded to the appropriate City personnel that handles the particular type of situation.

Responsible Parties

Planning Director

Summary of Measurable Goals

The measurable goals of the illicit discharges program will include:

1. Monitor the number and document the type of calls received and the actions taken in the response each year.
2. Document an annual review of outfall maps to ensure they are up-to-date.
3. Annual review of program and Ordinances, Update as needed.

4. Monitor the number of illicit discharges that are encountered and document enforcement procedures that are conducted. Evaluate number of reported illicit discharges and outcome.
5. Track the number of commercial/industrial uses assessed for possible illicit discharges and document resolution of illicit discharges identified.
6. Complete an assessment of non-stormwater discharges as required by Minimum Control Measure #3 along with implementing local controls were identified as needed.
7. Outfall map will be reviewed and updated annually or anytime new outfalls are created.
8. Ordinance No. 01-18-2007A

Summary of Development/Implementation Schedule

BMP#	PERMIT YEAR				
	2020	2021	2022	2023	2024
IDDE1	Continue to operate, publish and promote phone number, and document calls received each year.	Implement program improvements as warranted.	Monitor and revise as necessary	Monitor and revise as necessary	Monitor and revise as necessary
IDDE2	Continue to implement protocols for responding to complaints annually, and maintaining complaint database.	Monitor and revise as necessary	Monitor and revise as necessary	Monitor and revise as necessary	Monitor and revise as necessary
IDDE3	Conduct dry inspections of existing outfalls until all are inspected by the end of the permit. Identify and inspect new outfalls as they are constructed. Monthly Visits to drainage areas near businesses, abandoned businesses, active commercial areas. Code enforcement personnel will perform site visits and utilize law enforcement personnel to determine source if necessary.				
IDDE4	Implement program with water samples of suspect sources.	Continue ongoing program and revisions.	Continue ongoing program and revisions.	Continue ongoing program and revisions.	Continue ongoing program and revisions.

Enforcement

- 1) Issue stop work order, work with responsible party to Develop BMP

**Minimum Control Measure #4 :
Construction Site Stormwater Runoff Control**

Applicable City of Elkins BMPs

Construction Site Waste (**CSW**):

CSW1 -- Erosion and Sediment Control Regulations

CSW2 -- Inspections and Enforcement

Rationale

The City selected the above BMPs to address each component of the construction site runoff control requirements. Regulatory authority for implementation and enforcement of the City's erosion and sediment control program is provided in both the Stormwater Ordinance and other Codes and Ordinances. These Codes provide a framework for oversight of construction that requires erosion and sediment control measures during construction or redevelopment of sites disturbing greater than one acre. Additionally, the City requires a Grading Permit for sites of 1 acre. This permit is essentially the same as the large site permit and creates documentation of new housing sites and provides an avenue for pre-construction meetings and addresses for random site reviews. Specific requirements for construction site operators are addressed during the Site Plan Review, Technical Plat Review, and SWPPP review. The Stormwater Ordinance requires the development of erosion and sediment control plans and will be updated to include issues provided by the new ARR040000. Taken together, these adopted Codes and programs fulfill. Training of City staff to recognize and ensure that corrections to erosion problems on construction sites and to enforce the provisions of the City's adopted ordinances is a critical component of the stormwater management program, and this is being addressed through the development of specific, dedicated staff for permitting, inspections, enforcement, and the implementation of the City Stormwater Program.

Ordinance 01-18-2007A Chapter 10.30 STORMWATER/EROSION CONTROL.

All sites over one acre or in high risk areas will be reviewed.

Responsible Parties

The City's Planning Department maintains the City Code of Ordinances related to construction and coordinates the Site Plan and Drainage Review process. Ordinance No. 07-18-2007A, The Planning Director is responsible for implementation and inspection of approved land alteration and development projects for overall development criteria as well as erosion and sediment control and construction site runoff controls. Enforcement of these areas of the City's Codes is conducted in coordination with the Office of the City Attorney if necessary.

Summary of Measurable Goals

Staff will review the Municipal Code provisions related to erosion control and construction site runoff during the permit period and revise as necessary. The measurement of success of the program will be based on tracking of compliance and avoidance of impacts to water quality from land alteration and construction.

All members of the public are given the opportunity to attend Public hearings and Planning meetings.

All cases of reports of possible violations are handled on a first come first serve basis, Enforcement action will be initiated with a site inspection, if corrective measures have been taken, all information will be documented in the file.

Enforcement

- 1) Any non compliance or repeat offenders will be issued a stop work order, After review and education the planning department will decide if further permits will be issued.

Summary of Development/Implementation Schedule

BMP#	PERMIT YEAR				
	2020	2021	2022	2023	2024
CSW1	Review existing Municipal Code for erosion and construction site runoff control effectiveness. (Develop new code if needed)	Review, modify and enforce provisions as necessary.			
CSW2	Conduct inspections on an ongoing basis.	Conduct inspections on an ongoing basis.	Conduct inspections on an ongoing basis.	Conduct inspections on an ongoing basis.	Conduct inspections on an ongoing basis.

**Minimum Control Measure #5:
Post-Construction Stormwater Management for
New Development and Redevelopment**

Applicable City of Elkins BMPs

Development Standards (**DS**):

DS1 -- City Code of Ordinances, Engineering Drainage Criteria Manual and BMP Manual

DS2 -- Post Construction Stormwater System Maintenance Inspections and Compliance

DS3 – Low Impact Development

Rationale

The City selected the above BMPs to meet the post-construction Minimum Control Measure requirements. The City Stormwater Ordinance requires that new developments incorporate stormwater management BMPs to reduce the impacts associated with stormwater runoff generated at the site. BMP DS1 provides for maintenance of the appropriate Code of ordinances such that pollutants from stormwater runoff from new development are reduced to the maximum extent practicable, in partial compliance with the requirements of this Minimum Control Measure. BMP DS2 provides for the development of a long-term inspection and enforcement program, which is still needed to fulfill all the requirements noted above. BMP DS3 was selected to address opportunities for implementing water quality improvement projects associated with retrofits to an expansion of the public stormwater drainage system. This BMP will support the fulfillment of requirements 1 and 2 by providing publicly-funded and managed water quality improvement infrastructure to supplement the reduction of pollutants associated with increased stormwater runoff from a growing urban environment.

Responsible Parties

Planning Director

Summary of Measurable Goals

The regulatory framework for control of post-construction stormwater runoff is contained in the City Ordinance 01-18-2007A. This framework will be refined and expanded as needed to improve the City's capability to achieve reductions in stormwater pollution from new developments through periodic evaluations and updates to the Codes. Measurable goals will include to:

- (1) Monitor Technical Plat Review and Land Division approvals for the adequacy of stormwater quality management;
- (2) Monitor Stormwater Pollution Plans for the adequacy of stormwater quality management;
- (3) Monitor compliance achieved in private maintenance of stormwater management systems required in the development approval process; and
- (4) Monitor as needed any new stormwater drainage infrastructure that incorporates stormwater quality improvement facilities where practicable.
- (5) Consultation with city contracted engineering firm (currently Garver Engineering)

- (6) Development of POA will be encouraged along with the public education, some portions of properties with drainage systems are donated to the city as green space and maintained by city personnel.
- (7) All city staff has been trained to look for and report any erosion.

Summary of Development/Implementation Schedule

BMP#	PERMIT YEAR				
	2020	2021	2022	2023	2024
DS1	Review Codes and propose amendments as appropriate. Seek City Council approval & adoption of amendments. Review the BMP Manual and amend as needed to reflect Best Management Practices.	Continue enforcing existing Codes/ Drainage Manual and monitor/analyze effectiveness at achieving BMPs that comply with pollutant reduction MEP requirement and update as needed.	Continue enforcing existing Codes/ Drainage Manual and monitor/analyze effectiveness at achieving BMPs that comply with pollutant reduction MEP requirement and update as needed.	Continue enforcing existing Codes/ Drainage Manual and monitor/analyze effectiveness at achieving BMPs that comply with pollutant reduction MEP requirement and update as needed.	Continue enforcing existing Codes/ Drainage Manual and monitor/analyze effectiveness at achieving BMPs that comply with pollutant reduction MEP requirement and update as needed.

DS2	Maintain inspection and compliance activities and monitor/analyze program effectiveness and success/failure of BMPs observed over time.	Maintain inspection and compliance activities and monitor/analyze program effectiveness and success/failure of BMPs observed over time.	Maintain inspection and compliance activities and monitor/analyze program effectiveness and success/failure of BMPs observed over time.	Maintain inspection and compliance activities and monitor/analyze program effectiveness and success/failure of BMPs observed over time.	Maintain inspection and compliance activities and monitor/analyze program effectiveness and success/failure of BMPs observed over time.
DS3	Begin reviewing for LID impediments	Review for LID impediments	Review for LID impediments	Include efforts to identify and remove impediments for LID on report	Monitor and revise as necessary

Minimum Control Measure #6: Pollution Prevention in Municipal Operations

Applicable City of Elkins BMPs

Operation and Maintenance (OM):

OM1 -- Operation and maintenance program

OM2 – Employee Training Program

Rationale

As part of the contract with Northwest Arkansas Regional Planning Commission and the University of Arkansas Cooperative Extension Service, Cooperative Extension service employees will provide training at least once a year to MS4s.

Responsible Departments

- City of Elkins
 - All eligible city staff trained on BMP's
- University of Arkansas Cooperation Extension

Summary of Development/Implementation Schedule

BMP#	PERMIT YEAR				
	2020	2021	2022	2023	2024
OM1	Develop an operation and maintenance program. Inspect a list of facilities annually.	Inspect a list of facilities annually.	Inspect a list of facilities annually.	Inspect a list of facilities annually.	Inspect a list of facilities annually.
OM2	Conduct annual training for employees.	Conduct training as necessary for new hires.	Conduct annual training for employees.	Conduct training as necessary for new hires.	Conduct annual training for employees.