## 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 Elm Springs | ARR040016 | 88-00835 |

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 | 278 Jayroe | 289 Jayroe |
| County | Washington, Benton | |
| Urbanized/Core Areas | Fayetteville-Springdale-Rogers | |
| Receiving Stream | Lake Elmdale, Brush Creek, Tributary to Osage Creek, Illinois River | |
| Ultimate Receiving Stream | Arkansas River | |
| Contact Person & Title | Lorel Hoffman, Building Inspector/ Code Enforcement | Casey Jackson Building Inspector |
| Telephone Number | (479) 248-7323 | |
| Cognizant Official & Title | Ben Wall, Mayor | Harold Douthit mayor |
| Responsible Official & Title | Ben Wall, Mayor | Harold Douthit |

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:** Harold D. Douthit
**Responsible Official Title:** Mayor
**Responsible Official Signature:** _____
**Date:** 2-22-19

**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 Elm Springs

# STORMWATER MANAGEMENT PLAN

Prepared by: City of

Elm Springs

**March 2019**

**City of Elm Springs**
**Permit ARR 040016**
**AFIN 88-00835**
**March 7, 2019**

# City of Elm Springs

## STORMWATER MANAGEMENT PLAN

### Background and Context

The Elm Springs Stormwater Management Plan (Stormwater Plan) has been developed to provide policy and management guidance for activities affecting stormwater throughout the City of Elm Springs. It is intended to help the City fulfill its responsibilities under the Clean Water Act and 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, Elm Springs strives to preserve urban stormwater quality that negatively impacts local springs and streams, and to continue to develop and preserve the 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, Elm Springs, as part of the Illinois River Watershed 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 to drainage infrastructure and the natural features that help protect water quality and control flooding.
It is important to note that Elm Springs has not, under this SWMP requested a waiver from coverage as a small community with a population of less than 10,000 and an affected population included in the urbanized area of 973 persons.

### Description of the Permit Area

The City of Elm Springs (The City) currently serves a population of 2,137 (2019 estimates) within the city limits. The geographic boundaries of the MS4 plan only includes a tiny section along the extreme eastern boundary between Springdale & Elm Springs near Interstate 540. Approximately 973 residents reside within the urbanized area as defined by the 2010 Census, and the low-density suburban nature of the community has led to a «bedroom community» atmosphere. The City limits and the service area for planning encompasses approximately 10 square miles. The City has 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 City limits that lies

along the eastern edge of the community. The Mayor and Council have made determination that under the equal protection clause of the US Constitution, any regulatory measures adopted and enforced for a part of Elm Springs should apply for all residents and property within the municipal jurisdiction. Reporting requirements for regulatory purposes may not mirror Citywide efforts. The City lies directly west of Springdale, south of Cave Springs and north of Tontitown on the county line between Washington and Benton Counties. The town lies at the upper east area of the Illinois Watershed. The area includes and the tributary streams of the aforementioned 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. . In 2013, The City's stormwater management, drainage, and erosion control ordinance was adopted along with a complete update of the City's land development code. (Chapter 12, located in appendix A of this document.) The ordinance addresses the City's current jurisdiction and its newly annexed area to the west as it relates to maintenance, construction, development, performance criteria, and discharges.

**Purpose, Scope and Areas of Focus**

The purposes of the Stormwater Plan are threefold. First, the Stormwater Plan characterizes The City's entire 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 impervious area without provision for on-site infiltration of stormwater into the ground. The City regulates these issues through implementation of the Municipal Code within the city limits and through the subdivision regulations in its extraterritorial jurisdiction.

**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. 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 basis, 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 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.** The Lake Elmdale watershed is largely affected by upstream actions in the neighboring community of Springdale. Springdale has a much larger budget and staff and the City of Elm Springs remains dependent upon the good neighbor policy recently conceived that will

make for improved water quality in Lake Elmdale and the Brush Creek watershed.

**ADEQ-required Municipal Separate Storm Sewer System (MS4) Plan elements.** The NPDES Stormwater Program requires that the City submit a MS4 plan in order to acquire a 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:

a. Public Education and Outreach on Stormwater Impacts;
b. Public Involvement/Participation;
c. Illicit Discharges Detection and Elimination;
d. Construction Site Stormwater Runoff Control;
e. Post-Construction Stormwater Management for New Development and Redevelopment;
f. Pollution Prevention in Municipal Operations;

Under each of these areas described above, the City's MS4 plan must contain the following information:

The structural and non-structural Best Management Practices (BMPs) that the permittee or another entity will implement for each of the stormwater Minimum Control Measures;

The measurable goals (Benchmarks) for each of the BMPs including, as appropriate, the months and years in which the permittee will undertake required actions, including interim milestones and the frequency of the action; and

The person or persons responsible for implementing or coordinating the BMPs for the permittee's MS4 plan.

In addition to the requirements listed above, the permittee must provide a rationale for how and why each of the BMPs is selected and measurable goals for the permittee's stormwater management program.

Stormwater Best Management Practices (BMPs) is a term for methods to manage stormwater that reduce negative impacts of runoff on the receiving streams. While the term has become widely used by the regulatory agencies and throughout the stormwater management industry, it does ***not*** imply that each BMP is necessarily the "Best" at achieving a particular stormwater management objective. BMPs are alternatives to practices that reduce the water quality and flow management functions and benefits of the open drainage system such as piping, filling or hardening open drainage ways. BMPs include, but are not limited to:

physical structures or created natural features such as wetlands or ponds that improve water quality and/or attenuate flow;

maintenance or construction practices that prevent erosion, control sedimentation, and reduce pollution entering runoff;
educational strategies that inform the public, developers, business/industry, etc. on stormwater pollution prevention;
regulations and enforcement programs that protect water quality;
protection of open drainage ways for stormwater treatment and conveyance, and maintaining adjacent (riparian) buffers to provide natural stormwater filtration, cooling and long-term channel stability and other stormwater management functions; and the avoidance of piping, filling, or deteriorating the condition of open drainage ways.

**Overview of Elm Spring's Stormwater Drainage Systems**

As the name implies, Elm Springs has numerous natural springs, with flow in various tributaries throughout the Brush Creek and Osage Creek watershed. The low-density development patterns predominant in the town are drained by road side ditches and a few subdivisions with underground drainage systems, all emptying into the tributaries of Brush Creek. Periodic storm events have created temporary overtopping of Elm Springs Road near the Camelot Subdivision where surface drains accumulate and pond due to small cross drains and tight turns in drainage ditches. Periodic clearing of brush, leaves and debris in the main canals serving the developments to the east side of the community is conducted by the staff of the City's maintenance crew.

**Stormwater Drainage Basin Characterization**

The City’s stormwater drainage system has one major drainage Brush Creek which flows into the Little Osage Creek and Illinois 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 converging on a larger drainage way, ultimately culminating in outfalls to the major drainage ways. The character and condition of the drainage ways varies significantly throughout the basins, depending on surrounding land uses and contributing drainages.

## GOALS, POLICIES, & IMPLEMENTATION ACTIONS

This section provides overall guidance to the City in performing stormwater management activities in a manner consistent with State and Federal laws, while meeting local goals and the long-term outcomes the City hopes to achieve. The following goals are derived from long-term key outcomes that have been reviewed. The policies provide specific direction, consistent with the local goals, State and Federal requirements. Implementation actions include BMPs discussed in detail in the MS4 plan and other

actions needed to achieve local objectives. The work plan for completion of Implementation actions is in the Stormwater Plan Implementation Action Summary.

**GOAL 1:** *Protect citizens and property from floods*

## Policies

1.1 Maintain surface drainage in the City to reduce the threat of flooding, through proper maintenance of the City's stormwater drainage system infrastructure, with practices that are protective of water quality.

1.2 Through the development review process, ensure that new development incorporates adequate stormwater management infrastructure to avoid downstream capacity and water quality problems.

1.3 Preserve open stormwater drainage infrastructure where feasible, to best accommodate peak storm flows, maintain flood storage capacity, and promote water quality.

1.4 Adhere to standards, policies, and practices which comply with Federal Emergency Management Agency (FEMA) Flood Management Program requirements to ensure that the City maintains flood insurance coverage under this program.

## Implementation Actions

1. a. Continue evaluation of City maintenance practices and implement appropriate BMPs to assure that the City adequately maintains the stormwater drainage system capacity in an environmentally responsible manner.

1. b. Evaluate and refine the City's drainage program, including educational outreach, inspection, and enforcement components to reduce the negative stormwater impacts from land alteration, erosion, sedimentation, and excessive runoff.

1. c. Continue adding to the City Drainage Master Plan to assess the City's stormwater drainage system and capacity needs, and identify capital improvements and other measures necessary to maintain adequate system capacity for planned community growth.

1. d. Implement BMPs consistent with NPDES Minimum Control Measure #1, Public Education and Outreach on Stormwater Impacts, to ensure that the public is aware of the importance of preventing pollution from entering the streams and water bodies of the State.

1. e. Implement BMPs consistent with NPDES Minimum Control Measure #4, Construction Site Stormwater Runoff Control, to minimize or eliminate erosion and sedimentation in the stormwater drainage system.

1 f. Implement BMPs consistent with NPDES Minimum Control Measure #5, Post-Construction Stormwater Management for New Development and Redevelopment, to ensure that new development is in compliance with flow-regulating management practices, such as detention ponds, on-site stormwater storage, etc.

1. g. BMPs consistent with NPDES Minimum Control Measure #6, Pollution Prevention in Municipal Operations, to ensure adequate maintenance of the stormwater system.

**GOAL 2:** *Improve surface and sub-surface waters for aquatic life and other beneficial uses.*

**Policies**

2.1 The City will monitor and implement practices and regulatory programs with the objective of improving surface and groundwater quality to, at a minimum, meet State water quality standards, adequately protect threatened and endangered wildlife, and meet the State beneficial use guidelines.

2.2 The City will maintain its open channels and waterways in a manner that is protective of their natural stormwater management and habitat functions for the benefit of the citizens of the City, local wildlife, including threatened or endangered species, and future generations.

**Implementation Actions**

2. a. Promote pollution protection educational efforts, including signage, development project review, and public outreach.

2. b. Enhance erosion and illicit discharge detection and compliance efforts, including permitting and Code enforcement.

2. c. Implement BMPs consistent with NPDES Minimum Control Measure #1, Public Education and Outreach on Stormwater Impacts, to enhance citizens' and businesses' knowledge regarding water quality regulations as well as the benefits to the community from properly functioning waterways.

2. d. Implement BMPs consistent with NPDES Minimum Control Measure #3, Illicit Discharges Detection and Elimination, to eliminate or minimize toxic discharges from business and industry.

2. e. Implement BMPs consistent with NPDES Minimum Control Measure #4, Construction Site Stormwater Runoff Control, to minimize sedimentation and channel degradation from construction sites.

ensure long-term functioning of newly-developed sites.

2.g. Implement BMPs consistent with NPDES Minimum Control Measure #6, Pollution Prevention in Municipal Operations, to ensure that the stormwater drainage system is maintained in properly-functioning condition.

**GOAL 3:** *Preserve and maintain surface waters, wetlands, and riparian areas.*

**Policies**

3.1 Through the development review process, the City will ensure that development is protective of significant open waterways, wetlands, and riparian areas. Particular emphasis on spring preservation and protection measures will be included in the Planning Commission's development reviews for any projects that would affect the groundwater, springs and their various drainage outlets that contribute to the stream flows.

3.2 The City will implement permitting programs, educational outreach, compliance inspections and enforcement activities as needed to reduce erosion, sedimentation, illicit discharges, and other pollution impacts to the City's waterways.

**Implementation Actions**

3. a. The City will review and refine its drainage program, which addresses erosion, sedimentation, and the impacts of land alteration, including permitting, inspections, technical educational and outreach, and enforcement.

3. b. The City will review development proposals for impacts on open drainage ways, wetlands, and riparian areas, and protect the functions and benefits of these areas as provided for in the Development Code and Engineering Design Standards.

3. c. The City will work cooperatively with citizens, businesses, and agencies to protect and improve surface waterways, seek opportunities for stewardship partnerships, further enhance educational opportunities, and continue participation in intergovernmental work groups.

3. d. The City will implement and continue to refine/improve BMPs for all City activities with potential to impact water quality and/or the functions of waterways, wetlands, and riparian areas.

3. e. Implement BMPs consistent with NPDES Minimum Control Measure #4, Construction Site Stormwater Runoff Control, to reduce or eliminate sedimentation from construction sites as a contributor to poor water quality and quantity management.

3 f. Implement BMPs consistent with NPDES Minimum Control Measure #5, Post-Construction Stormwater Management for New Development and Redevelopment, so new development at a minimum maintains the functioning of the stormwater drainage system, and doesn't contribute to future degradation.

3. g. Implement BMPs consistent with NPDES Minimum Control Measure #6, Pollution Prevention in Municipal Operations, which is critical to maintaining properly functioning wetland and riparian areas and open channels.

**GOAL 4:** *Citizens, businesses, and industries understand the need to protect water quality.*

**Policies**

4.1 The City will develop targeted education and outreach and technical assistance programs regarding practices and obligations for keeping debris and pollutants out of the stormwater drainage system and train stakeholder groups in appropriate erosion control and sediment prevention practices, as well as stormwater management BMPs.

4.2 The City will seek to form partnerships with neighborhoods or groups interested in providing stewardship of local waterways.

4.3 The City will develop, implement, and enforce appropriate building, design, and Municipal Codes to address water quality compliance issues, including pollution, habitat, and aesthetic issues, to encourage the development of urban waterways that are positive amenities in the community.

**Implementation Actions**

4. a. The City will continue to support outreach and education efforts regarding water quality, riparian and wetland areas, including business, contractor, and developer outreach programs to educate these parties about their impacts on stormwater quality.

4. b. Continue to maintain enforcement and compliance activities, including inspections, technical assistance, and Code enforcement.

4. c. Implement BMPs consistent with NPDES Minimum Control Measure #1, Public Education and Outreach on Stormwater Impacts, to engage the public in the efforts to create positive urban amenities.

4. d. Implement BMPs consistent with NPDES Minimum Control Measure #3, Illicit Discharges Detection and Elimination, to ensure that waterways are safe, meet State water quality standards, and can function as positive amenities

**GOAL 5:** *Urban drainage ways and springs become community amenities.*

**Policies**

5.1 The City will conduct education and outreach activities to appropriate target groups to increase understanding of the importance of maintaining safe and clean drainage ways, and to seek volunteers willing to be caretakers for water features near them.

5.2 The City will, through the Code of Ordinances Design Standards, protect existing springs and waterways and encourage site planning and landscaping that enhances the attractiveness and natural functions of the water features.

5.3 The City will maintain urban drainage ways in a manner that provides for safe and attractive conditions within the limits of its fiscal constraints.

**Implementation Actions**

5. a. Enhance the City's erosion control program, including educating developers and the community regarding the positive aspects of open waterways to promote acceptance, and integrating effective compliance and enforcement components.

5. b. Provide adequate funding within the City's restraints for public maintenance of the stormwater drainage system, and ensure ongoing maintenance of private stormwater features through development agreements.

5. c. Increase educational outreach to schools to increase awareness of children regarding the need to keep litter and pollutants out of urban drainage ways.

5. d. Implement all six of the NPDES Minimum Control Measure BMPs. Implementing all of the provisions of the MS4 plan will ultimately result in improved water quality and quantity management, improved habitat and resource protection, and, ultimately, enhance urban waterways as desirable community amenities.

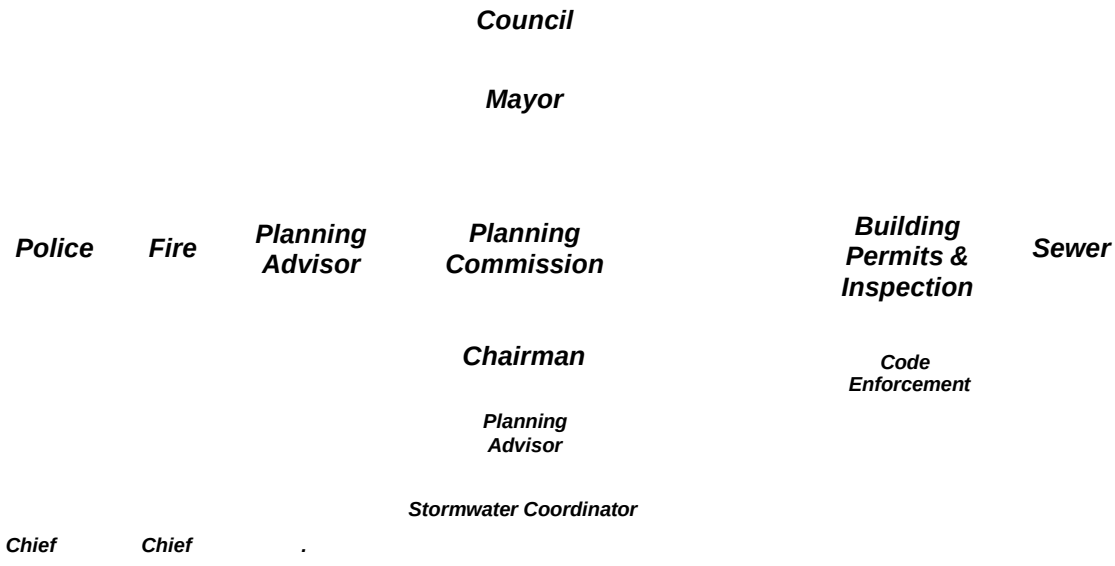


**City Stormwater Management Program - Responsible Parties:**

. 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 should the waiver not be granted, the City has developed this 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 and Community Development Department. However, the implementation of the City's MS4 plan will extend throughout the City organization by implementing a Stormwater Committee with representatives from Planning, Code Enforcement, Sewer, Volunteer Fire Department and Police. Each Department's task would be recognizing stormwater issues of their facility and the fieldwork they do and logging data for any event that is stormwater related. Public Education and Involvement would be encouraged with their fellow crewmembers, families and neighbors.

## City Organization Chart



**NPDES Phase II BMP Requirements:**

Specific BMPs are proposed for each Minimum Control Measure, which are intended to support the reduction of discharges of pollutants in stormwater runoff to the maximum extent practicable (MEP) as required by the Federal-NPDES Phase II rules. Table 1 provides a summary of the selected BMPs and the associated implementation schedule. In this section, a summary sheet is provided for each Minimum Control Measure, which includes a list of the selected BMPs, the rationale for their development and selection, and a summary of the measurable goals and implementation schedule. A fact sheet follows the summary sheet for each of the selected BMPs. Together, the summary sheets and the BMP fact sheets provide the following information in accordance with the Federal rules:

1. A list of the responsible parties for the BMP implementation;
2. A brief description of the BMP;
3. A description of existing conditions
4. The proposed MS4 plan activities;
5. Measurable goals; and
6. An implementation schedule.

The BMP development/implementation schedule shows when certain activities will be completed on a fiscal year basis. The NPDES Phase II rules provide for a five-year implementation schedule starting from August 2014, which is when the City submitted its original MS4 permit application materials. Therefore, the BMP implementation schedule lays out a five-year schedule starting with fiscal year 2015.

## A. Minimum Control Measure #1:

**Public Education and Outreach on Stormwater Impacts**

**Permit Requirements**: Regulation 40 CFR 122.34(b)(1): "The permittee must implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff."

**Decision Process**

The City of Elm Springs participates in monthly meetings of the NWA Stormwater Compliance Group. We also have representation on 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 issues and target audiences and program methods and public relations strategies.

**Applicable Public Education/Outreach BMPs**

*Develop and distribute electronic and printed 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 have been 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, podcasts, e-learning modules, website content, newsletters, press releases, and PSAs.

*Measurable Goals:*

A minimum of 20 electronic and printed educational materials will be developed.

The number of educational materials distributed will be documented.

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

*Create displays and staff educational booths*

Displays highlighting the annual topics of emphasis will be created and set up/staffed at libraries, banks, schools, local festivals, county fairs, etc.

*Measurable Goal:*

Stormwater displays will be created and used at a minimum of 3 events/locales

*Conduct stormwater programs for adult audiences*

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 SWMP.

*Measurable Goal:*

At least 5 stormwater education programs will be conducted for adult audiences

*Conduct hand-on youth stormwater/water quality education programs*

Educational programs for school youth will focus on the water cycle, watersheds, stormwater dynamics, water quality and pollution prevention using the EnviroScape surface runoff model, groundwater simulator, hands-on exercises from Project WET, Project WILD, and Project Learning Tree and creek side classrooms. Programs conducted will support the Arkansas State Frameworks/Common Core required curriculum.

*Measurable Goals:*

At least 5 stormwater education programs will be conducted for youth audiences

**Responsible Party**

The Northwest Arkansas Regional Planning and the University of Arkansas Cooperative Extension Service has 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 487 residents (50% of the urbanized area population).

## Minimum Control Measure #1:
## 5 Year Implementation Schedule

| 2019 | 2020 | 2021 | 2022 | 2023 |
|---|---|---|---|---|
| *Topic Emphases:* Yard Management and Land Development Community | *Topic Emphasis:* Automotive maintenance | *Topic Emphasis:* Septic system and pool maintenance | *Topic Emphasis:* Litter/trash management | *Topic Emphasis:* Irrigation management to minimize runoff/ disconnecting impervious surfaces |
| *Target Audience:* Homeowners, and Land Development | *Target Audience:* Vehicle owners | *Target Audience:* Homeowners with septic systems/ pools | *Target Audience:* General public, homeowners | *Target Audience:* Homeowners and businesses with irrigation systems and guttering |
| *Rationale:* Improper yard waste disposal and uncontained dirt/soil can clog storm drains and excess fertilizer and pesticide applications can contaminate stormwater with nutrients and | *Rationale:* Leaking automotive fluids and washing vehicles on paved surfaces allow oil, grease and chemicals to be carried in stormwater to local waterways | *Rationale:* Malfunctioning septic systems, improper handling and disposal of pool chemicals and emptying chlorinated pool water can impact stormwater quality | *Rationale:* Improper handling and disposal of litter can allow it to enter the storm drain system and impact stormwater quality | *Rationale:* Efficient irrigation conserves water and prevents it from entering the storm drain system while disconnecting impervious surfaces minimizes runoff by enhancing infiltration |

## B. Minimum Control Measure #2:

**Public Involvement/Participation**

**Permit Requirements**: The permittee must, at a minimum, comply with State and local public notice requirements when implementing a public involvement/participation program.

**Decision Process**

The City of Elm Springs participates in monthly meetings of the NWA Stormwater Compliance Group. We also have representation on the 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 issues and target audiences and program methods and public relations strategies.

**Applicable BMPs**

*Engage Residents in Stormwater Policy Development*

Input from both the MS4 Stormwater Compliance Group and Education Steering Committee guides the emphases of electronic and printed educational materials. Once topics have been 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, podcasts, e-learning modules, website content, newsletters, press releases, and PSAs. (This item to be tracked and documented within Public Education/Outreach, MCM #1)

*Measurable Goals:*

The number of educational/announcements materials distributed will be documented. (see MCM #1)

MS4 Stormwater Compliance Group and Education Steering Committee meetings attendance will be documented. (see MCM #1)

*Train and Utilize Volunteer Educators*

"Train-the-trainer" processes will be used to engage public volunteers and educators in teaching stormwater and pollution prevention (e.g. Benton and Washington County Master Gardeners, Master Naturalists, Lake Smart Leaders, etc.)

*Measurable Goal:*

At least 1 train-the-trainer program will be conducted.

C*onduct Public Participation/Involvement Events*

Citizen and youth groups will participate in public involvement events (litter pick up, establishing demonstration rain gardens, planting riparian vegetation, stenciling storm drain inlets, etc.).

*Measurable Goal:*

At least 5 public participation events will be coordinated.

**Responsible Parties**

The jurisdiction is responsible for the development and implementation of the public involvement and participation efforts, utilizing the services of the University of Arkansas Cooperative Extension Service (contracted through the Northwest Arkansas Regional Planning Commission).

**Performance Standard**

At least 5 public participation and involvement activities will be conducted.

**Minimum Control Measure #2:**
**5 Year Implementation Schedule**

| 2019 | 2020 | 2021 | 2022 | 2023 |
|---|---|---|---|---|
| *Program Emphasis:* Engage organizations (such as Master Gardeners, POAs and lawn care/landscaping professionals) to promote stormwater pollution prevention education | *Program Emphasis:* Engage HHW Collection Centers and automotive shops to promote their vehicle fluid collection | *Program Emphasis:* Partner with POAs, Health Department and watershed organizations to promote proper septic system function through inspections and regular pumping | *Program Emphasis:* Coordinate clean up events (potential locations: creek, lake, park, trail or roadway) | *Program Emphasis:* Partner with the Arkansas Irrigation Association to promote proper irrigation system use/maintenance |
| *Target Audience:* Homeowners, lawn care/landscaping professionals | *Target Audience:* Vehicle owners, automotive maintenance professionals | *Target Audience:* Homeowners with septic systems or swimming pools | *Target Audience:* MS4 residents | *Target Audience:* Homeowners and businesses with irrigation systems |
| *Rationale:* Improper management of grass clippings and leaves can clog storm drains and excess fertilizer and pesticide applications can contaminate stormwater with nutrients and chemicals | *Rationale:* Improper handling/ disposal of automotive fluids allow oil, gasoline and other vehicle fluids to be transported in stormwater to local waterways | *Rationale:* Malfunctioning septic systems, improper handling and disposal of pool chemicals and emptying chlorinated pool water can impact stormwater quality | *Rationale:* Improper handling and disposal of litter can allow it to enter the storm drain system and impact stormwater quality | *Rationale:* Efficient irrigation conserves water and prevents it from entering storm drain systems |

**Minimum Control Measure #3:**

# Illicit Discharges Detection and Elimination

**Permit Requirements**: The permittee must:

1. Develop, implement and enforce a program to detect and eliminate illicit discharges [as defined in 40 CFR §122.26(b)(2)] into the permittee's small MS4;
2. Develop a storm sewer system map, showing the location of all outfalls and the names and location of all waters that receive discharges from those outfalls;
3. To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the permittee's storm sewer system and implement appropriate enforcement procedures and actions. Possible sanctions include non-monetary penalties (such as stop work orders), fines, bonding requirements, and/or permit denials for non-compliance.
4. Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the permittee's system;
5. Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and

6. Address the following categories of non-storm water discharges or flows (illicit discharges) if the permittee identifies them as significant contributors of pollutants to the permittee's small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR §35.2005(20)), 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, de-chlorinated swimming pool discharges, and street wash water. Discharges or flows from firefighting activities are excluded from the effective prohibition.
7. The permittee must also develop a list of other similar occasional incidental non-storm water discharges (e.g. non-commercial or charity car washes) that will not be addressed as illicit discharges. These non-storm water discharges must not be reasonably expected (based on information available to the permittees) to be significant sources of pollutants to the MS4, either because of the nature of the discharges or conditions the permittee have established for allowing these discharges to the permittee's MS4 (e.g., a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs on the wash water). The permittee must document in the permittee's storm water management program plan any local controls or conditions placed on the discharges. The permittee must include a provision prohibiting any individual non-storm water discharge that is determined to be contributing substantial amounts of pollutants to the permittee's MS4.
8. The permittee must develop a process to respond to and document complaints relating to illicit discharges.

**Applicable City of Elm Springs BMPs**

**Illicit Discharge Detection and Elimination (IDDE):**

**IDDE1 –** Illicit Discharges Reporting and Tracking System

**IDDE2 –** Illicit Discharges Response and Enforcement

**IDDE3 –** Outfall Inventory and Mapping

**IDDE5 –** Citywide Illicit Discharge Detection and Elimination

**IDDE6 –** Non-Stormwater Discharge Assessment

Rationale

Elm Springs selected the above five 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, in fulfillment of Requirement 8 above. IDDE1, reporting and tracking, has several methods of presumed illicit spills, sightings and discharges to be reported. Most of the City's personnel, while doing their daily jobs will report potential illicit problem areas to the Stormwater Coordinator. 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 to the Illicit Complaint files complete with pictures and the investigation results. Larger incidents with water bodies, fish kills with unknown circumstances will be reported to State Game & Fish Commission 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 IDDE3 Outfall Inventory and Mapping is a project the City has begun, and will complete and maintain during the permit period in accordance with Requirement 2 above. The map was created by using aerial photography and direct measurement and photo Documentation in coordination with NWARPC, and by the new computer program which Elm Springs has begun employee training – Pictometry. The map is updated as needed by the Planning Advisor. New development designs are developed on the GIS system using developer provided CADD files for the newly platted areas. Approved construction drawings on CADD showing streets, inlets and development tie-ins to existing storm drains or outfalls from the development are transferred from the development drawings to the storm sewer map. BMP IDDE4 includes the monitoring program conducted by the City to identify and track the sources of illicit discharges, which will support compliance with Requirement 4 above. The City's program to prohibit and enforce elimination of illicit discharges is described under BMP IDDE2, and addresses Requirements 1 and 3 above. Requirement 5 to inform the public regarding the hazards of illicit discharges is implemented through several of the public education BMPs such as Clean Water In to Storm Curb Drain and Door Hangers. Activities conducted under BMP IDDE5 Requirements 6, 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. This assessment and appropriate follow up will be conducted as BMP IDDE6. Requirement 8 is covered by pubic knowledge of phone numbers of City Hall and Police Dispatch. Complaint phoned in regarding and incident are forwarded to the appropriate City personnel that handles the particular type situation.

MS4 employees, businesses, industries and general public will be informed of the hazards associated with illicit discharges and improper disposal of wastes in conjunction with PE1 and PE3.

**Responsible Parties**

The City Stormwater Inspector, City Inspector and Planning Commission

**Performance Standard**

The successful implementation of a tracking and elimination program that includes complete mapping of the storm sewer system, standard forms and procedures, and the ability to track progress of events such as screenings, inspections, and enforcement

**Summary of Measurable Goals**

The measurable goals of the illicit discharges program will include:

- Develop, implement and enforce a program to detect and eliminate illicit discharges. The program will include regulatory and enforcement mechanisms.
- Monitor the number and document the type of calls received and the actions taken in response each year.
- Document an annual review of outfall maps of the storm sewer system to ensure they are up-to-date.
- Monitor the number of illicit discharges that are encountered and document enforcement procedures that are conducted.
- Monitor the number of commercial/industrial uses assessed for possible illicit discharges and document resolution of illicit discharges identified.
- Complete an assessment of non-stormwater discharges as required by Minimum Control Measure #3, Requirements 6 and 7, along with implementing local controls where identified as needed.

**Summary of Development/Implementation Schedule**

## Minimum Control Measure #3:
## 5 Year Implementation Schedule

| BMP# | PERMIT YEAR | | | | |
|---|---|---|---|---|---|
| | YR 2019 | YR 2020 | YR 2021 | YR 2022 | YR 2023 |
| IDDE1 | Publish and promote phone number, and document calls received each year. Develop tracking program | Implement program improvements as warranted. | Monitor and revise as necessary | Monitor and revise as necessary | Monitor and revise as necessary |
| IDDE2 | Implement protocols for responding to complaints annually, and maintaining complaint and enforcement data base. | Monitor and revise as necessary | Monitor and revise as necessary | Monitor and revise as necessary | Monitor and revise as necessary |

| | | | | | |
|---|---|---|---|---|---|
| **IDDE3** | Conduct dry weather inspection to identify and map existing storm sewer infrastructure. And update the storm sewer outfall map as needed. Approximately 20% of City Area | Conduct dry weather inspection to identify and map existing storm sewer infrastructure. And update the storm sewer outfall map as needed. Approximately 20% of City Area per permit year | | | |
| **IDDE4** | Conduct dry inspections of existing outfalls, covering 20% of the total number.<br>Identify and inspect new outfalls as they are constructed or found.<br>Add new inlets & outfalls to previously developed maps. | Conduct dry inspections of existing outfalls, covering an additional 20% each year until all are inspected by the end of the permit.<br>Identify and inspect new outfalls as they are constructed or found.<br>Add new outfalls to previously developed paper maps.<br>Add last year's developments or revisions as additions to digital maps for each year's update. | | | |
| **IDDE5** | Continue to implement program | Monitor and revise as necessary | Monitor and revise as necessary | Monitor and revise as necessary | Monitor and revise as necessary |
| **IDDE6** | Assess and revise IDDE5 as needed | Monitor and revise as necessary | Monitor and revise as necessary | Monitor and revise as necessary | Monitor and revise as necessary |

**Minimum Control Measure #4:**

# Construction Site Stormwater Runoff Control

**Permit Requirements**: The permittee must develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the permittee's small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre must be included in the permittee's program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. For stormwater discharges associated with small construction activity in accordance with 40 CFR §122.26(b)(15)(i), the permittee will develop, implement, and enforce a program to reduce pollutant discharges from such sites. The permittee's program must include the development and implementation of, at a minimum:

i. An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law;
ii. Requirements for construction site operators to implement appropriate erosion and sediment control Best Management Practices;
iii. Requirements for construction site operators to prevent or control waste that may cause adverse impacts to water quality such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site;
iv. Procedures for site plan review and land division that incorporate measures to prevent or control potential water quality impacts;
v. Procedures for receipt and consideration of information submitted by the public; and
vi. Procedures for site inspection and enforcement of control measures.

**Applicable City of Elm Springs BMPs**

Construction Site Waste **(CSW):**

**CSW1 –** Stormwater Drainage Ordinance

**CSW2 –** Erosion and Sediment Control Regulations

**CSW3 –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 Code of 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 or greater. This permit is essentially the same as the large site permit and creates documentation of new housing sites and provides an avenue for preconstruction meetings and addresses for random site reviews. Specific requirements for construction site operators are addressed during the Plan Review, Plat Review and SWPPP review processes and are included in the Planning Review Processes for any applicants & Building Code. The Stormwater Ordinance regulates the development of erosion and sediment control plans and will be updated to include issues provided by ARR 40000. Additionally, the nuisance prohibitions section of the Code of Ordinances provide authority to regulate construction sites to prevent or control wastes that can adversely impact water quality. Taken together, these adopted Codes and programs fulfill Requirements 1 through 4 described above. Training of City staff to recognize and correct 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 Committee. This program is ongoing, and is intended to fulfill Requirement 6.

**Responsible Parties**

The City Clerk maintains the City Code of Ordinances related to construction and coordinates the Site Plan and Drainage Review process. The Planning Advisor and the Building Inspector are 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 City Attorney if necessary.

**Summary of Measurable Goals**

Planning Commissioners with guidance from Planning Advisor and City Inspector will review the Municipal Code and Development 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.

**Performance Standard**

The successful creation and implementation of an ordinance detailing the permitting, inspection and enforcement of construction site stormwater runoff control measures.

**Summary of Development/Implementation Schedule**

## Minimum Control Measure #4: 5 Year Implementation Schedule

| BMP# | PERMIT YEAR | | | | |
|---|---|---|---|---|---|
| | YR 2019 | YR 2020 | YR 2021 | YR 2022 | YR 2023 |
| CSW1 | Review existing Municipal Code and Development Code for erosion and construction site runoff control effectiveness. | Review, modify and enforce provisions as necessary. | Review, modify and enforce provisions as necessary. | Review, modify and enforce provisions as necessary. | Review, modify and enforce provisions as necessary. |
| CSW2 | Review newly submitted projects to ensure compliance with drainage ordinance. | Track land drainage and alteration compliance and impacts to water quality on an annual basis. | Track land drainage and alteration compliance and impacts to water quality on an annual basis. | Evaluate Municipal Code and develop amendments as needed to achieve compliance with CWA and ESA. | Program review and assessment. |
| CSW3 | Conduct inspections on an ongoing basis. | Implement existing Code authority on an ongoing basis. | Review and amend the Code as appropriate. | Review and amend the Code as appropriate. | |

## Minimum Control Measure #5:

## Post-Construction Stormwater Management for

## New Development and Redevelopment

**Permit Requirements**: The permittee must:

1. Develop, implement, and enforce a program to ensure reduction of pollutants in storm water runoff to the maximum extent practicable (MEP) from new development and redevelopment projects that disturb one acre or more, or less than one acre if they are part of a larger common plan of development or sale, and discharge into the permittee's small MS4. The permittee's program must

ensure that controls are in place that would prevent or minimize water quality impacts.

2. Develop and implement strategies that include a combination of structural or non- structural BMPs appropriate for the permittee's community.
3. Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law.
4. Ensure adequate long-term operation and maintenance of BMPs; and ensure adequate enforcement of ordinance or alternative regulatory program.

**Applicable City of Elm Springs BMPs**

Development Standards **(DS):**

**DS1 --** City Code of Ordinances, Drainage Plans & BMP Manual

**DS2** -- Post Construction Stormwater System Maintenance Inspections and Compliance

**DS3** -- LID

**Rationale**

The City selected the above BMPs to meet the post-construction Minimum Control Measure requirements. The City Code of Ordinances will be amended under Subdivision Regulations to require 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 requirements and the more specific design requirements included in the developer submittal requirements and BMP Manual, 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 and expansion of the public stormwater drainage system. This BMP will support fulfillment of requirements 1 and 2 by providing publicly-funded and managed water quality improvement infrastructure to supplement reduction of pollutants associated with increased stormwater runoff from a growing urban environment.

**Responsible Parties**

Planning
Public Works
Building Permitting and Inspection
Water and Sewer

**Summary of Measurable Goals**

The regulatory framework for control of post-construction stormwater runoff is contained in the City's Code of Ordinances and BMP Manual. 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:

monitor Technical Plat Review and Land Division approvals for adequacy of stormwater quality management;
monitor Stormwater Pollution Plans for adequacy of stormwater quality management;
monitor compliance achieved in private maintenance of stormwater management systems required in the development approval process; and
monitor as needed any new stormwater drainage infrastructure that incorporates stormwater quality improvement facilities where practicable.

## Minimum Control Measure #5: 5 Year Implementation Schedule

| BMP# | PERMIT YEAR | | | | |
|---|---|---|---|---|---|
| | **YR 2019** | **YR 2020** | **YR 2021** | **YR 2022** | **YR 2023** |
| **DS1** | Review Codes and propose amendments as appropriate. Seek City Council approval & adoption of amendments. Review Drainage Ordinance and BMP Manual and amend as needed to reflect Best Management Practices. | Continue enforcing existing Codes/ Drainage Ordinance and monitor/analyze effectiveness at achieving BMPs that comply with pollutant reduction MEP requirement and update as needed. | Continue enforcing existing Codes/ Drainage Ordinance and monitor/analyze effectiveness at achieving BMPs that comply with pollutant reduction MEP requirement and update as needed. | Continue enforcing existing Codes/ Drainage Ordinance and monitor/analyze effectiveness at achieving BMPs that comply with pollutant reduction MEP requirement and update as needed. | Continue enforcing existing Codes/ Drainage Ordinance 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

**Permit Requirements:** The permittee must:
Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and
Using training materials that are available from the ADEQ, EPA, or other organizations, the permittee's program must include employee training to prevent and reduce stormwater pollution from activities including, but not limited to, park and open space maintenance, fleet and building maintenance, new municipal facility construction and related land disturbances, design and construction of street and storm drain systems, and stormwater system maintenance.

Applicable City of Elm Springs BMPs
Operation and Maintenance (OM):
OM1 -- Operation and maintenance program that includes a training component
OM2 – clear and maintain all bridges and primary culverts to insure proper, unimpeded drainage
OM3 -- Pollution Control Programs for City Operations OM4 --
Stormwater Quality Technology Pilot Program OM5 -- Channel
Assessment
OM6 -- Vehicle Maintenance Facility Stormwater Pollution Control Plan
OM7 – clean all driveway culverts annually

## Rationale

As part of the contract with Northwest Arkansas Regional Planning and the University of Arkansas Cooperative Extension Service, Cooperative Extension service employees will provide training at least once a year to MS4s. The training includes information on construction sites, park & open space maintenance, and fleet & building maintenance. Jurisdictional-specific ordinances, policies, and mandates will also be addressed during these trainings and specific system maintenance as departmentally appropriate. Training will stress how the employees are the "eye and ears" of the city and that they should learn to recognize signs of illicit discharge and how to properly report these instances. Recommendations from the employees are also addressed during the regional stormwater compliance committee' monthly meetings, and these recommendations help to shape the educational outreach messages.

The City selected the above five BMPs to address Minimum Control Measure #6 - Pollution Prevention in Municipal Operations. BMP OM1 includes:

1. Implementation of a Pollution Control Manual for Routine Maintenance Activities; and

2. Continue scheduled evaluations of City practices, such as those associated with Public Works, Parks and Recreation Department activities, and develop pollution control manuals or procedures as appropriate.

A City Pollution Control Manual for Routine Maintenance Activities will be developed with the intent to meet requirements 1 and 2 above, along with other Federal regulatory programs. Further evaluation of other City Departments' (Police & Sewer) activities with potential to impact stormwater will also be included in BMP OM1. The Pollution Control Manual will be adapted to improve maintenance operations as appropriate. BMP OM2 includes pilot testing of stormwater quality technologies that meet pollution reduction objectives. BMP OM3 provides an updated assessment of open channel conditions. This assessment will assist the City in prioritizing capital improvements and maintenance activities that improve open channel stormwater quality functions throughout the city. Each of the BMPs aims to prevent or reduce pollutants contained in urban stormwater runoff from municipal operations. Training on the practices outlined in the City's Pollution Control Manual for Routine Maintenance Activities, which addresses requirement ii of this Minimum Control Measure, is covered under BMP OM1. Site specific stormwater quality management practices will be included in the Vehicle Maintenance Facility Stormwater Pollution Control Plan (SPCP) (BMP OM4). BMP OM5 addresses street sweeping as a pollution control practice, and includes an assessment and evaluation of existing practices and implementing improved practices as appropriate.

**Responsible Departments**

- Planning
- Sewer
- Police

Cave Springs Volunteer Fire Department
University of Arkansas Cooperative Extension

## Minimum Control Measure #6: 5 Year Implementation Schedule

| BMP# | PERMIT YEAR | | | | |
|---|---|---|---|---|---|
| | **YR 2019** | **YR 2020** | **YR 2021** | **YR 2022** | **YR 2023** |
| **OM1** | Compile list of facilities and develop BMP's as needed. | Utilize procedures for operations and maintenance. | Utilize Procedures for operations and maintenance. | Utilize Procedures for operations and maintenance. | Utilize Procedures for operations and maintenance. |
| **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. |

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Appendix:

City of Elm Springs Zoning Ordinance
Chapter 12, Stormwater Management, Drainage and Erosion Control

http://www.elmsprings.net/uploads/Zoning_Chapter_12.pdf

City Website:

http://www.elmsprings.net/

City Zoning Ordinance:

http://www.elmsprings.net/Zoning_Ordinances.html

City grading ordinance:

http://www.elmsprings.net/uploads/Zoning_Chapter_10.pdf

City flood damage prevention code:

http://www.elmsprings.net/uploads/Zoning_Chapter_11.pdf