

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
Crawford County	ARR040036	88-00863

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	300 Main Street, Room 4	
County	Crawford	
Urbanized/Core Areas	Fort Smith	
Receiving Stream	Arkansas River	
Ultimate Receiving Stream	Arkansas River	
Contact Person & Title	Dennis Gilstrap , Emergency Management Coordinator	
Telephone Number	(479) 471-3260 <i>Brad Thomas</i>	
Cognizant Official & Title	Dennis Gilstrap , Emergency Management Coordinator	
Responsible Official & Title	John Hall , County Judge	

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: Brad Thomas
 Responsible Official Title: Director - CCDEA
 Responsible Official Signature: *Brad Thomas*
 Date: 12-3-2019

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

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

CRAWFORD COUNTY, ARKANSAS
STORMWATER MANAGEMENT PROGRAM (SWMP)

Mission Statement

Crawford County, Arkansas in coordination with the City of Van Buren, Arkansas shall develop, implement, and enforce a SWMP designed to reduce the discharge of pollutants from small MS4 to the maximum extent practicable to protect water quality, and to satisfy the appropriate water quality requirements and the clean Water Act.

DEFINITIONS

All definitions contained in Section 502 of the Act and 40 CFR 122 shall apply to this permit and are incorporated herein by reference. For convenience, simplified explanations of some regulatory/statutory definitions have been provided, but in the event of a conflict, the definition found in the Statute or Regulation takes precedence.

"Best Management Practices (BMPs)" means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants to waters of the United States. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

"Control Measure" as used in this permit, refers to any Best Management Practice or other method used to prevent or reduce the discharge of pollutants to waters of the United States.

"CWA" means the Clean Water Act or the Federal Water Pollution Control Act, 33 U.S.C. '1251 et seq.

"Director" means the Director, Arkansas Department of Environmental Quality, or a designated representative.

"Discharge" when used without qualification means the "discharge of a pollutant.

"Discharge of Stormwater Associated with Construction Activity" as used in this permit, refers to a discharge of pollutants in stormwater runoff from areas where soil disturbing activities (e.g., clearing, grading, or excavation), construction materials or equipment storage or maintenance (e.g., fill piles, borrow area, concrete truck washout, fueling), or other industrial stormwater directly related to the construction process (e.g., concrete or asphalt batch plants) are located.

"Discharge-related activities" include: activities which cause, contribute to, or result in stormwater point source pollutant discharges; and measures to control stormwater discharges, including the siting, construction and operation of best management practices (BVWs) to control, reduce or prevent stormwater pollution.

"Eligible" means qualified for authorization to discharge stormwater under this general permit.

"Facility" or "Activity" means any NPDES "point source" or any other facility (including land or appurtenances thereto) that is subject to regulation under the NPDES program.

"Illicit Connection" means any man-made conveyance connecting an illicit discharge directly to a municipal separate sewer.

"Illicit discharge" means any discharge to a municipal separate storm sewer that is not composed entirely of stormwater except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from emergency firefighting activities.

"Large Municipal Separate Storm Sewer System" means all municipal separate storm sewer systems that are either:

Located in an incorporated place with a population of 250,000 or more as determined by the latest Decennial Census by the Bureau of Census: or

Located in the counties with unincorporated urbanized populations of 250,000 or more, except municipal, separate storm sewers that are located in the incorporated places, townships or towns within such counties; or

Owned or operated by a municipality other than those described that are designated by the Director as part of the large or medium municipal separate storm sewer system.

"MEP" means Maximum Extent Practicable, the technology-based discharge standard for municipal separate storm sewer systems to reduce pollutants in stormwater discharges. A discussion of MEP as it applies to small MS4s is found at 40 CFR 122.34. CWA section 402(p) requires that a municipal permit shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system design, and engineering methods, and other provisions such as the Administrator or the State determines appropriate for the control of such pollutants.

"Measurable Goal" means a quantitative measure of progress in implementing a component of a stormwater management program.

"Medium Municipal Separate Storm Sewer System" means all municipal separate storm sewer systems that are either:

Located in an incorporated place with a population of more than 100,000 but less than 250,000 as determined by the latest Decennial Census by the Bureau of Census: or Located in the counties with unincorporated urbanized populations of more than 100,000 but less than 250,000, except municipal, separate storm sewers that are located in the incorporated places, townships or towns within such counties; or Owned or operated by a municipality other than those that are designated by the Director as part of the large or medium municipal separate storm sewer system.

"MS4" means Municipal Separate Storm Sewer System"

"Municipal Separate Storm Sewer" means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, and storm drains):

Owned or operated by a state, city, town, county, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or a designated and approved management agency under section 208 of the Clean Water Act (33 U.S.C. 1288) that discharges to waters of the United States;

Designed or used for collecting or conveying stormwater;

That is not a combined sewer; and

That is not part of a publicly owned treatment works.

"NOI" means Notice of Intent to be covered by this permit.

"NOT" means Notice of Termination.

"Non-Traditional MS4" means systems similar to separate storm sewer systems in municipalities, such as systems at military bases, hospitals, public universities or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewer systems in very discrete areas such as individual buildings.

"Off-Lot Home Sewage Treatment System (HSTS)" means a system designed to treat home sewage on-site and discharges treated wastewater off-lot.

"On-Lot Home Sewage Treatment System (HSTS)" means a system designed to treat home sewage on-lot with no discharges leaving the lot.

"Outfall" means a point source as defined by 40 CFR 122.2 at the point where a municipal separate storm sewer discharges to waters of the United States and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other waters of the United States and that are used to convey waters of the United States.

"Owner or operator" means the owner or operator of any "facility or activity" subject to regulation under the NPDES program.

"Permitting Authority" means the Arkansas Department of Environmental Quality.

"Physically Interconnected" means that one municipal separate storm sewer system is connected to a second municipal separate storm sewer system in such a way that it allows for direct discharges into the second system.

"Point Source" means any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

"Pollutant" is defined at 40 CFR 122.2. A partial listing from this definition includes: dredged spoil, solid waste, sewage, garbage, sewage sludge, chemical wastes, biological materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial or municipal waste.

"Qualified personnel" staff knowledgeable in the operation and maintenance of Municipal Separate Storm Sewer Systems (MS4) possessing the skills necessary to gather and evaluate information regarding an MS4 program.

"Significant contributors of pollutants" means any discharge that causes or could cause or contribute to a violation of surface water quality standards.

"Small MS4" means any MS4 not already covered by the Phase I stormwater program

Crawford County, Arkansas in coordination with the City of Van Buren, Arkansas will or already has implemented the best management practices (BYWs) for each of the following six (6) stormwater minimum control measures;

1. **Public Education and Outreach on Stormwater Impacts**

Crawford County has identified all of its unincorporated areas which lie in the Fort Smith, AR — OK Urbanized Area also laid within the 5-mile planning jurisdiction of the City of Van Buren Arkansas. Crawford County's target audience will be residence and business owners within this identified area. These target audiences were selected to comply with ADEQ requirements and to inform these residence and businesses about steps they can take to reduce storm water pollution. Crawford County will coordinate "with the City of Van Buren to distribute stormwater pollution prevention information to the public. An informational flyer is distributed twice each year with all City water bills. Van Buren has adopted a new storm sewer manhole cover design that provides a visual reminder that no dumping is allowed in the storm water system. A code enforcement door hanger (copy submitted by Van Buren with their plan) is being distributed to educate

residents concerning clean-up ordinances and penalties associated with non-compliance. Storm water pollution and prevention information is now on CCDEM web page. CCDEM educates commercial, industrial, and institutional groups about the impacts of their work regarding storm water quality.

Recognize and report illegal discharges.

Identifying pollutants in our streams often relies on the general public. Educating residents and businesses about illegal discharges, and the way to report these discharges will clearly help reduce illegal discharges.

Installing and maintaining proper stormwater management controls on development sites.

Failure to maintain sediment controls on construction sites can be a major direct contributor of silt to our streams. Overseeing management of construction sites to minimize sediment will be a critical component of protecting streams.

Keep animal waste from polluting our streams.

Identifying area poultry houses and cattle farms near streams are important to maintain discharge.

Educating farmers on best practices are recommended.

Improving stormwater runoff through lawn care practices.

Yard waste can contribute to the nutrient load of streams. Keeping yard waste out of streams is an important dimension of keeping nutrients out of our streams.

Reduce and clean stormwater runoff with a focus on using trees.

When stormwater does not runoff, it cannot carry pollution to the streams. It also does not contribute to the increases to stream flow that accompany rain events and are otherwise exacerbated by stormwater runoff. USEPA recommends trees be incorporated into stormwater practices.

2. **Public Involvement Participation**

In coordination with the City of Van Buren, Arkansas, Crawford County Storm water ordinances and regulations receive a public hearing before ad **Public Participation Activities for Crawford County SWMP**

1. Host public meetings in regards to SWMP education.
 - A. Proposed site EOC by end of 2021.
2. Work with citizen volunteers to educate about the SWMP program.
 - A. Proposed Site EOC by end of 2023
3. Encourage tree planting in the appropriate areas.
 - A. Work with the city of Alma Arkansas on the Alma Lake Trail. By end of 2022
4. Work with local outdoor groups to encourage monitoring.
 - A. Work with local Kayak and hiking groups to encourage monitoring and reporting of stormwater issues. Projected by 2023
5. Annual training at the Crawford County Road Department regarding Stormwater practices options by the Crawford County Quorum Court. Projected implementation by 2021.

3. **Illicit Discharge Detection and Elimination**

Crawford County, Arkansas in coordination with the City of Van Buren, Arkansas is developing the storm sewer map in a Geographic Information System (GIS) using high resolution aerial photography and field surveys using GPS equipment. The City of Van Buren, Arkansas ' Ordinance No. 142009(the City of Van Buren, AR has submitted this ordinance with ADEQ) prohibits dumping in streets, alleys, gutters, ditches or storm drains. Crawford County, Arkansas adopted Ordinance No. 33 — 2008 Dated ___Day of October 2013. The Ordinance was adopted to develop procedures, rules and regulations for the review of proposals to develop properly located within unincorporated areas of Crawford County, Arkansas identified by the Arkansas Department of Environmental Quality Storm Water Pollution Prevention Plan. Also, Crawford County has developed a program for the detection and tracking Q/illicit discharges.

4. **Construction Site Stormwater Runoff Control**

Crawford County, Arkansas adopted Ordinance No. 33-2008 which states It shall be unlawful for any person or entity to develop or make

changes in the use of property located in the area described by the ordinance without first obtaining a permit for such development from the Arkansas Department of Environmental Quality and to obtain approval of a written plan or plan for development from the County Judge or his designee. The cost of the Crawford County, Arkansas use plan shall be \$25.00 per parcel of real property. The plan is titled CRAWFORD COUNTY SITE DEVELOPMENT PERMIT/EROSION CONTROL PLAN In coordination the City of Van Buren, Arkansas adopted Ordinance No. 11-2004 on 7/19/04

and Ordinance No. 14-2009 which provides for a \$50.00 to \$500.00 fine per violation. Single-family residence construction requires a minimum standard permit. Multi-family residential, commercial and industrial projects must submit a project specific erosion control plan that is reviewed and approved by the Engineering Department.

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

Crawford County, Arkansas coordinates with the City of Van Buren, Arkansas and their Ordinance No. 11-2004 which contains post-construction erosion control measures. Additionally, Van Buren, Arkansas enforces Minimum Drainage Standards for all subdivision construction (Ord. No. 401980).

6. Pollution Prevention/Good Housekeeping for Municipal Operations

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

The measurable goals for each of the BMPs, the ones the MS4 believes to have the authority to implement, including, as appropriate, the months and years in which the MS4 will undertake required actions, including interim milestones and the frequency of the action. At a minimum, measurable

goals shall be implemented to satisfy this general permit's performance standards;

- In coordination with the City of Van Buren, Arkansas Crawford County, Arkansas believes it has implemented and met the requirements its stormwater permit.

For Crawford County, Arkansas in coordination with the City of Van Buren, the Crawford County Judge delegates the following position title or titles, for implementing or coordinating the BWTs for the SWMP.

e The Crawford County, Arkansas ' Road Superintendent is responsible for implementing or coordinating the BMPs for control practice 6 of the SWMP.

- The Crawford County Department of Emergency Management Director is responsible for implementing or coordinating the BMPs for control practices 1, 2, 3, 4 and 5 of the SWMP.

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

- The City of Van Buren, Arkansas ' Public Workers Director determined that this seemed to be the quickest way to obtain compliance.

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

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

Minimum Control Measures

Public Education and Outreach on Stormwater

Impacts

Crawford County, Arkansas in coordination with the City of Van Buren, Arkansas has documented the decision process for the development of a stormwater public education and outreach program.

An informational flyer is distributed twice each year with all City of Van Buren, Arkansas water bills. The City of Van Buren, Arkansas has adopted a new storm sewer manhole cover design that provides a visual reminder that no dumping is allowed in the storm water system. Crawford County, Arkansas will coordinate the stormwater public education and outreach program with the City of Van Buren, Arkansas. Under the authority of the Crawford County Judge the Crawford County Director of Emergency Management and the Crawford County Road Superintendent will coordinate the SWMP.

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

Every household and business within the city limits are targeted through water bill flyers and print media. print media also targets the households and business in the unincorporated areas of the Fort Smith, Arkansas/Oklahoma Urbanized Area.

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

Crawford County, Arkansas' in coordination with the City of Van Buren, Arkansas' outreach strategy will be to reach every house hold and business within the city limits is targeted through water bill flyers and print media. The outreach strategy will be to reach the unincorporated areas of the Fort Smith, Arkansas/Oklahoma Urbanized Area of Crawford County with print media.

The Director of the Crawford County Department of Emergency Management is responsible for overall management and implementation of the stormwater public education and outreach program.

The MS4 will evaluate the success of the minimum measures by watching for visible reduction of pollutants in storm water. No monitoring is proposed at this time.

Public Involvement/Participation

Storm water ordinances and regulations receive a series of public hearings before the Planning Commission before adoption by the City Council and Quorum Court. The public input helps to shape community standards and is welcomed at these meeting. Said meetings will be coordinated between Crawford County, Arkansas and the City of Van Buren, Arkansas.

All Van Buren citizens and citizens and businesses located in the unincorporated areas of the Fort Smith, Arkansas/Oklahoma Urbanized Area have been welcomed to meetings to develop storm water ordinances.

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

The Director of the Crawford County Department of Emergency Management is responsible for the overall management and implementation of the stormwater public involvement/participation program.

Crawford County, Arkansas in coordination with the City of Van Buren, Arkansas will watch the level of public support or community involvement projects, watch for improved cleanliness of stream banks and watch for visible reduction of pollutants in storm water.

Illicit Discharge Detection and Elimination

Decision process. The permittee shall document the decision process for the development of a stormwater illicit discharge detection and elimination program.

Crawford County, Arkansas in coordination with the City of Van Buren, Arkansas will develop a storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information was used for the maps, and the plan to verify the outfall locations with field surveys.

The City of Van Buren, Arkansas has developed the storm sewer map in a Geographic Information System (GIS) using high resolution aerial photography and field surveys using GPS equipment.

The City of Van Buren, Arkansas Ordinance No. 14-2009 prohibits dumping in streets, alleys, gutters, ditches or storm drains. Crawford County, Arkansas , entire Fort Smith, Arkansas/Oklahoma Urbanized Areas are located within the 5-mile planning jurisdiction of the City of Van Buren, Arkansas.

Ordinance No. 14-2009 also provides for a \$50.00 to \$500.00 fine per violation.

All Crawford County employees will be vigilant to detect and address illicit discharges to the MS4 system, including discharges from illegal dumping and spills. Crawford County, Arkansas will be responsible for dry weather field screening for non-stormwater flows and field tests of selected chemical parameters as indicators of discharge sources as ADEQ recommends.

As these employees carry out their normal daily functions they will be vigilant to locate priority areas which include areas with higher likelihood of illicit connections (e.g., areas with older sanitary sewer lines, for example) or ambient sampling to locate impacted reaches.

Storm drain maps **and visual inspections** will be used to trace **an illicit** discharge upstream to source.

Crawford County, Arkansas will coordinate with the City of Van Buren, Arkansas to enforce compliance with Ordinance No. 14-2009 which prohibits dumping in streets, alleys, gutters, ditches or storm drains.

Procedures for program evaluation and assessment.

Crawford County, Arkansas will evaluate and assess the SWMP by visual monitoring for illicit discharges in storm water in coordination with the City of Van Buren, Arkansas

An informational flyer is distributed twice each year with all City of Van Buren, Arkansas water bills. The City of Van Buren, Arkansas has adopted a new storm sewer manhole cover design that provides a visual reminder that no dumping is allowed in the storm water system. Crawford County, Arkansas will coordinate the stormwater public education and outreach program with the City of Van Buren, Arkansas. Under the authority of the Crawford County Judge the Crawford County Director of Emergency Management and the Crawford County Road Superintendent will coordinate the SWMP.

The Crawford County Road Superintendent is responsible for overall management and implementation of the stormwater illicit discharge detection and elimination program.

Crawford County, Arkansas in coordination with the City of Van Buren, Arkansas will watch the level of public support for community involvement projects, watch for improved cleanliness of stream banks and watch for visible reduction of pollutants in storm water.

The Crawford County, Arkansas stormwater illicit discharge detection and elimination shall include dry-weather screening of all stormwater outfalls located in the MS4's urbanized area at the time of this permit coverage over the permit term. Only those outfalls draining undeveloped watersheds do not need to be screened for illicit discharges. In coordination with the City of Van Buren, Arkansas the storm sewer system map shall be updated annually as needed for changes occurring in the urbanized area boundaries at the time of permit coverage. .

Annual Reporting shall document the following: (1) number of outfalls dry weather screened, (2) number of dry-weather flows identified, (3) number of illicit discharges identified, (4) number of illicit discharges eliminated, (5)

provide schedules for elimination of illicit connections that have been identified but have yet to be eliminated and (6) summary of any storm sewer system mapping updates.

Construction Site Stormwater Runoff Control

Crawford County, Arkansas' ORDINANCE NO. 33 — 2008 will be used to require erosion and sediment controls at construction sites and w/o' the MS4 chose that mechanism.

The City of Van Buren, Arkansas' Ordinance No. 11-2004 provides for Stop work orders, permit revocation and a \$250.00 per day fine. Crawford County, Arkansas will coordinate erosion and sediment regulations in areas within the City of Van Buren, Arkansas' 5 mile planning jurisdiction with the City of Van Buren, Arkansas. This will include the requirement for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites that may cause adverse impacts to water quality. Such waste includes discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste.

Crawford County, Arkansas requires a Site Development Permit / Erosion Control Plan to be completed as a prerequisite to the issuance of said permit as referenced in Crawford County's ORDINANCE NO. 33 _2008. Said Site Permit / Erosion Control Plan is reviewed and approved by the Crawford County Judge 's designee.

Public input is received by the Crawford County Judge's Office and referred to the appropriate department, board or commission for appropriate action.

The procedures for site inspection and enforcement of control measures are contained in the Crawford County Site Development / Erosion Control Plan referenced in ORDINANCE NO. 33 - 2008.

The Crawford County Road Department is responsible for overall management and implementation of the construction site stormwater control program.

Crawford County, Arkansas will evaluate the success of this minimum measure by watching for improvement in construction site erosion control practices.

Crawford County, Arkansas construction site stormwater control program shall include pre-construction site plan reviews (reviews of construction site Stormwater Pollution Prevention Plans) of 100 percent of projects from construction activities that result in a land disturbance of greater than or equal to one acre within the Fort Smith, Arkansas / Oklahoma Urbanized Area located in the unincorporated areas of Crawford County are applicable and shall be inspected at least on a monthly basis to ensure compliance.

The annual report shall document the following: (1) number applicable

sites in the MS4's jurisdiction, (2) number of pre-construction site plan reviews performed, (3) number and frequency of site inspections, (4) number of violation letters issued, (5) number of enforcement actions taken and (6) number of complaints received and number followed up.

Post-Construction Stormwater Management in New Development and Redevelopment

Crawford County, Arkansas coordinates with the City of Van Buren, Arkansas the program to address stormwater runoff from new development and redevelopment projects. Include in this description any specific priority areas for this program. Crawford County, Arkansas' Site development / Erosion Control plan referenced as Exhibit "B " in ORDINANCE NO. 33, 2008 addresses the above issue. Ordinance No. 11-2004 contains postconstruction erosion control measures (copy attached). Additionally, Van Buren enforces Minimum Drainage Standards for all subdivision construction (Ord No. 40-1980). Ordinance No. 11-2004 and 40-1980 are available on the Van Buren website at <http://www.vanburencity.org/LandDevelopment/>.

This coordination will be tailored to specifically address the unincorporated areas of Crawford County, Arkansas located in the Fort Smith, Arkansas / Oklahoma Urbanized Area minimize water quality impacts, and attempt to maintain pre-development of conditions. Reference Crawford County, Arkansas, ORDINANCE NO. 33 - 2008 and the City of Van Buren, Arkansas, Ordinance No. 11-2004 contains post-construction erosion control measures (copy attached). Additionally, Van Buren enforces Minimum Drainage Standards for all subdivision construction (Ord. No. 40-1980)

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

Any structural BMPs in the Crawford County, Arkansas SWMP, including, as appropriate: storage practices such as wet ponds and extended-

detention outlet structures; filtration practices such as grassed vegetation, bioretention cells, sand filters and filter strips; and infiltration practices such as infiltration basins and infiltration trenches will be address in coordination with the City of Van Buren, Arkansas.

Crawford County, Arkansas in coordination with the City of Van Buren, Arkansas will address post-construction runoff from new developments and redevelopments through enforcement of the City of Van Buren 's Ordinance No. 11-2004 contains post-construction erosion control measures (copy attached). Additionally, Van Buren enforces Minimum Drainage Standards for all subdivision construction (Ord. No. 40-1980) and Crawford County ORIDNANCE NO. 33 - 2008.

After a one-year warrantee period the City of Van Buren assumes responsibility for O&M stormwater improvements and in coordination after a one-year warrantee period Crawford County, Arkansas assumes responsibility for O & M stormwater improvements located within its ' right of way easements.

The Crawford County, Arkansas Road Department is responsible for overall management and implementation of the post-construction SWW.

Crawford County, Arkansas will evaluate the success of this minimum measure, including how the MS4 selected the measurable goals for each of the BMPs by visual inspection for reduction of pollutants in storm water.

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

The MS4 annual reports shall document the following: (1)number of applicable sites in the jurisdiction requiring post-construction controls, (2) number of pre-construction site plan reviews performed, (3) number of inspections performed to ensure as built per requirements, (4) compliance rates with MS4 requirements, and (5) number of long-term operation and maintenance (O&M) plans developed and agreements in place.

Low Impact Development. ADEQ recommends MS4s to evaluate their existing codes and planning procedures to remove impediments to low impact

development and green infrastructure. ADEQ also encourages municipalities to evaluate proposed developments using green infrastructure for waivers from local requirements in their community planning process. You must include information on efforts to identify and remove impediments to LID in the post-construction program element of the Annual Report covering the 4th year of the permit. Crawford County, Arkansas will make every effort to meet these ADEQ recommendations in coordination with the City of Van Buren, Arkansas.

Pollution Prevention/Good Housekeeping for Municipal Operations

Crawford County, Arkansas in coordination with the City of Van Buren, Arkansas shall document the decision process for the development of a pollution prevention/good housekeeping program for municipal operations.

Crawford County, Arkansas, operation and maintenance program to prevent or reduce pollutant runoff from the municipal operations shall include Crawford County, Arkansas' county-maintained roads and drainage systems within the right of way of specified roads.

Crawford County, Arkansas ' Road Department incorporates Stormwater training into normal training sessions for Road Department employees. This training should prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. All training program will be coordinated with the outreach programs developed for the public information minimum measure and the illicit discharge minimum measure.

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

Crawford County, Arkansas in coordination with the City of Van Buren, Arkansas will used the controls listed above for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance

shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas the permittee operates.

Crawford County, Arkansas will proper disposal of waste removed from the MS4 and the municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris by placing in a properly monitored construction fill site or an approved landfill.

All flood management projects will be reviewed by the Crawford County, Arkansas Floodplain Administrator.

The Crawford County, Arkansas Road department is responsible for overall management and implementation of the pollution prevention/good housekeeping program.

Crawford County, Arkansas will visually evaluate the success of this minimum measure.

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

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