



City of Bloomingdale, Georgia

Stormwater Management Program (SWMP)

National Pollutant Discharge & Elimination System (NPDES)

Phase I Medium Municipal Separate Storm Sewer System (MS4) Permit 2022-2027

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- Appendix C Maps & Inventory
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ACRONYMS/DEFINITIONS

BMPs	Best Management Practices
CIP	Capital Improvement Project
CSS	Coastal Stormwater Supplement
DoA	Georgia Department of Agriculture
E&S	Erosion & Sedimentation
EPD	Georgia Environmental Protection Division
ESPCP	Erosion & Sedimentation Control Plan
GESA	Georgia Erosion & Sedimentation Act
GI	Green Infrastructure
GIS	Geographic Information System
GSMM	Georgia Stormwater Management Manual
GSWCC	Georgia Soil & Water Conservation Commission
HVPS	Highly Visible Pollution Source
IDDE	Illicit Discharge Detection and Elimination
IGP	Industrial General Permit
IWP	Impaired Waters Plan
LDA	Land Disturbance Activity
LEED	Leadership in Energy and Environmental Design
LIA	Local Issuing Authority
LID	Low Impact Development
MOU	Memorandum of Understanding
MS4	Municipal Separate Storm Sewer System
MSDS	Materials Safety Data Sheet
NPDES	National Pollutant Discharge & Elimination System
NRCS	Natural Resources Conservation Service
PFH	Pesticides, Fertilizers & Herbicides
POC	Pollutant of Concern
ROW	Right-of-Way
SWMP	Stormwater Management Program
SWP3	Stormwater Pollution Prevention Plan

EXECUTIVE SUMMARY

The City of Bloomingdale received renewed coverage under the 2022-2027 National Pollutant Discharge and Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) Permit (GAS000207) on April 12, 2022, as required by provisions of the Georgia Water Quality Control Act and the Federal Clean Water Act. A copy of the City's Permit Reapplication form to renew coverage under this permit and a copy of the City's 2022-2027 MS4 Permit is included in Appendix A. This permit requires the development of a Stormwater Management Plan (SWMP), to address the following program elements:

- Structural and Source Control Measures
- Illicit Discharge Detection and Elimination
- Industrial Facility Stormwater Runoff Control
- Construction Site Runoff Management
- Highly Visible Pollutant Sources
- Enforcement Response Plan
- Impaired Waters
- Municipal Employee Training
- Public Education
- Public Involvement
- Post Construction
- Green Infrastructure

The stormwater management program described within this document demonstrates the commitment of the City of Bloomingdale to water resources protection.

SWMP IMPLEMENTATION RESPONSIBILITY

Stormwater responsibilities and implementation of this Plan are overseen by the City of Bloomingdale's Public Works Department. Public Works staff work in conjunction with other City staff members, when necessary, to ensure implementation of this plan.

The City of Bloomingdale shares responsibility for BMP permit implementation with one other entity – Chatham County. Chatham County performs some canal maintenance within City limits in accordance with its Memorandum of Agreement (MOA), which is included in Appendix B.

1. STRUCTURAL & SOURCE CONTROL MEASURES

Permit Section 3.3.1: Structural and Source Control Measures, Table 3.3.1

1.1. MS4 STRUCTURE INVENTORY AND MAP

1.1.1. Description

The City of Bloomington's MS4 is made up of the structures and facilities that are used for collecting, conveying, storing and/or treating stormwater from the source drainage area to the point of final outlet. The City's NPDES Phase I Medium MS4 Permit defines the MS4 as follows:

"Municipal Separate Storm Sewer System (MS4) means a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains, owned or operated by a municipality or other public body, designed or used for collecting or conveying stormwater runoff and is not a combined sewer or part of a Publicly Owned Treatment Works."

Bloomington's stormwater system is comprised of the following structures that are regulated by the MS4 Permit:

- Catch Basins
- Pipes/Storm Drain Lines
- Ditches
- Municipal Detention / Retention Ponds
- Water Quality Vaults

The City of Bloomington has completed a Geographic Information System (GIS) inventory and map of the MS4. The MS4 inventory and map is included in Appendix C. The City will continue to maintain and update this inventory on an annual basis. This will be accomplished through review of new development as-built maps as well as field inspections.

1.1.2. Measurable Goals

- Maintain and update a map of MS4 control structures, each reporting period.
- Maintain and update an inventory of MS4 control structures, each reporting period.

1.1.3. Schedule

- Each reporting period, 2022-2027.

1.1.4. Annual Report Documentation

- Updated inventory and map of the MS4.
- Number of MS4 structures added or deleted during the reporting period
- Total number and/or length of structures in the inventory.

1.2. MS4 INSPECTION AND MAINTENANCE PROGRAM

1.2.1. Description

The City will inspect 100% of the MS4 features identified within the MS4 inventory over the five-year period of this permit, with at least 5% of MS4 structures inspected each reporting period.

Inspection Procedures

The City will visually inspect the MS4 within each maintenance zone in accordance with the following procedures:

- Inspections will generally include a condition assessment of the various system elements including, but not limited to, catch basins, storm drain lines, ditches, and visible areas of stormwater controls (i.e. detention/retention ponds and water quality vaults).
- Storm drain lines will be visually inspected where they outfall into a structure or open drainage way, unless access is restricted due to obstructions.
- Visible areas of stormwater quality vaults, such as where stormwater enters or outfalls, will be visually inspected; underground components that are not visible without entry will not be inspected.
- Inspections will be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer.
- A table listing the information that will be collected and documented during site inspections within a GIS database is provided in Appendix D.
- The condition assessment will include a visual evaluation of the structure that addresses structural condition and maintenance need(s). The following conditions in Table 1 will be noted and indicate that a structure needs maintenance:

Table 1: MS4 Maintenance Criteria

Structure	Standard for Maintenance
Catch Basins	Sediment fills up to the lowest invert
Ditches	50% filled with sediment
Pipes	50% filled with sediment
Detention / Retention Pond	50% filled with sediment
Water Quality Vault	50% filled with sediment

Maintenance Procedures

Upon completion of an inspection, the City will determine if maintenance is needed based on inspection results and the City's maintenance criteria. The City will prioritize maintenance needs based on their potential impact to the functionality of the public MS4. Maintenance shall be prioritized and performed in general accordance with the following standards:

- The City will schedule appropriate maintenance as needed and in accordance with available City resources.

- The City will respond to all citizen complaints related to MS4 structures, and will perform maintenance as needed.
- All stormwater management structures will be maintained such that they function in general accordance with their design and the standards, criteria, and information presented in the latest edition of the Coastal Stormwater Supplement (CSS) and Georgia Stormwater Management Manual (GSMM).
- Sediment will be removed before 50% of the capacity of the structure has been lost.
- Trash and debris will be removed from structures.
- Manmade and natural objects that are causing or could potentially cause a blockage to the system will be removed.
- Excess emergent vegetation will be removed.
- Bank side vegetation and vegetation in the maintenance right-of-way will be mowed or trimmed, but not removed to protect against erosion.
- Ditches that are not draining properly will be re-graded to match existing pipe invert grades, to the extent possible.
- Materials removed from the MS4 during maintenance will be properly disposed of by the City or a contractor hired by the City.
- Maintenance activities for MS4 structures are documented.

Chatham County will inspect and maintain the following major canals within the City of Bloomingdale in accordance with the procedures outlined in the MOA, included in Appendix B. The specific canals and mileage to be maintained is shown in Table 2 below:

Table 2: Chatham County Canal Maintenance

Canal Name	Mileage
Pipemakers	3.31
Conaway Bridge	0.17
Hiram Bridge	0.16
Conaway End Bridge	0.18
Douglas Bridge	0.52
Adams Road	0.8
Stagecoach	0.33
Osteen Bridge	0.64
Hardin	3.45
Patrick	0.29
E. Main	0.74

1.2.2. Measurable Goals

- Conduct inspections of the MS4 structures so that 100% of the structures are inspected within the five-year period, with a minimum of 5% of inspections occurring each reporting period.
- Conduct maintenance on MS4 structures as needed.

1.2.3. Schedule

- Ongoing, 2022 -2027.

1.2.4. Annual Report Documentation

- Number/length and percentage of total structures inspected and maintained during the reporting period.
- Documentation of inspections conducted, such as a table of individual inspection reports with a record for each structure inspected, and the findings of that inspection.
- Documentation of maintenance conducted during the reporting period, such as copies of Work Orders created and completed related to MS4 structures maintenance and/or summary of maintenance activities.

1.3. PLANNING PROCEDURES

1.3.1. Description

1.3.1.A. Comprehensive Plan

The City of Bloomingtondale's Comprehensive Plan outlines goals and specific policies that are designed to protect the local quality of life. The Comprehensive Plan guides future land use, provides the framework for the City's zoning code, addresses natural resource protection, and recommends stormwater infrastructure improvements. The City updated its Comprehensive Plan in 2021. A copy of the City's Plan is provided in Appendix B.

The following goals and policies of the Comprehensive Plan impact the City's stormwater program and envision a "green infrastructure" approach to stormwater management.

Vision: "To provide effective and efficient services to the citizens of Bloomingtondale at fair and equitable rates while maintaining the historical integrity of the core of the city and planning for the future with managed development and growth."

Goals:

- Preserve the "small city" sense of the Community and Traditional Values
- Core area development
- Housing and mixed-use development
- Expand recreation opportunities

1.3.2. Measurable Goals

- Review and update the Comprehensive Plan as needed.

1.3.3. Schedule

- Each reporting period, 2022-2027.

1.3.4. Annual Report Documentation

- Description of any changes made to the Comprehensive Plan or a copy of the update Plan.

1.4. STREET MAINTENANCE

1.4.1. Description

1.4.1.A. Street Maintenance Program

The City of Bloomingdale does not own or maintain any curb and gutter streets, and therefore, the City does not conduct any street sweeping. Curb and gutter streets within City limits are owned and maintained by the Georgia Department of Transportation.

The City manually collects litter and debris from road shoulders as part of the City's routine street cleaning and maintenance activities and removes litter and debris on an as-needed/customer complaint basis throughout the City if there is an illegal dumping issue. Litter and debris collected from street maintenance and cleanup-up activities is disposed of by a third-party contractor at a local landfill.

1.4.1.B. Roadside Ditch Maintenance

Roadside ditches that are located within the City Right-of-Way (ROW) are considered part of the public MS4 and are inspected and maintained by the Public Works Department to ensure effective operation. The City of Bloomingdale currently maintains approximately 47 miles of roadside ditches.

Ditches will be inspected as part of the City's proactive "MS4 Inspection and Maintenance Program," described in Section 1.2 and ditch maintenance will be conducted as needed based on the inspection results and the City's maintenance criteria.

- Ditches are inspected and mowed at least once per reporting period, and often more frequently, during the growing season.
- Litter and debris are removed prior to mowing and disposed of at a local landfill.
- When roadside ditch inspections indicate that emergent vegetation is interfering with normal flow, excess emergent vegetation will be removed by hand or machinery to ensure proper functioning of the ditches.
- Roadside ditches are cleaned if accumulated sediment or other deposits exceed the design depth.
- The City maintains a log to document mowing activities and litter and debris removal.

1.4.1.C. De-icing Procedures

De-icing is not often necessary in coastal Georgia, and the City of Bloomingdale does not maintain a stockpile of any material for this purpose.

1.4.1.D. Roadway Construction Erosion & Sedimentation Control

The Department of Public Works is responsible for ensuring that all minimum measure BMPs required by the Georgia Erosion and Sedimentation Act are implemented for City of Bloomingdale road construction projects, where appropriate.

The City contracts with a third-party vendor for street repair such as pothole repair, asphalt patching, and road re-grading if needed. Minor road repairs are handled by the City.

1.4.2. Measurable Goals

- Conduct roadside ditch maintenance and shoulder street maintenance at least once/reporting period through mowing and litter removal activities.
- Maintain roadside ditches and street shoulders each reporting period through mowing and litter removal activities.

1.4.3. Schedule

- Ongoing: 2022-2027.

1.4.4. Annual Report Documentation

- Provide log of trash and debris removal activities including amount of trash and debris removed during street and roadside ditch maintenance activities or, alternatively, provide an invoice or similar documentation from a third-party waste contractor and/or receiving landfill that documents how the waste was properly recycled and/or disposed.

1.5. FLOOD MANAGEMENT PROJECTS

1.5.1. Description

1.5.1.A. New/Proposed Flood Management Projects

The City of Bloomingdale currently requires developers to comply with the Stormwater Management Ordinance, which details the rules and regulations governing post-development stormwater management practices for new development and redevelopment. The regulations require developers to submit a stormwater site plan for all developments that are not specifically exempted within the ordinance. Site stormwater management plans must address water quality and water quantity issues in accordance with the requirements of the NPDES Phase I MS4 Permit, the latest edition of the Coastal Stormwater Supplement, and applicable local development regulations.

The stormwater site plan is reviewed by a Georgia-registered Professional Engineer (contracted or City staff) and approved by the Community Development Department before a land disturbing activities (LDA) Permit is issued and construction can begin.

The City will ensure that all new/proposed flood management projects are assessed for water quality impacts during the design phase. For the purposes of this BMP, the City interprets “Flood Management Projects” to refer to detention/retention ponds and water quality vaults. All new developments will be required to comply with the City’s Post-Construction Runoff Control requirements addressed in the Stormwater Management Ordinance, which require that stormwater management controls address water quality as well as water quantity protection.

1.5.1.B. Existing Flood Management Projects

The City developed Water Quality Assessment Procedures to ensure that existing City-owned flood management projects (i.e., detention/retention ponds and water quality vaults) are assessed for potential retrofitting to address water quality impacts. These Procedures were approved by the Georgia EPD during the last permit period for other coastal MS4s and meet the requirements of the City’s new MS4 permit. The City’s Water Quality Assessment Procedures for Existing Flood Management Projects are provided in Appendix D.

The City or a third-party contractor will perform Water Quality Assessments for 100% of all City-owned detention / retention ponds and water quality vaults during the 5-year permit period to assess the potential to retrofit these publicly-owned structures to incorporate additional control measures to improve water quality treatment. If more than five flood management structures are listed on the inventory, the City will inspect at least one of the flood management structures each reporting period. If, however, an assessment was previously performed on an existing flood management structure using the 2016 GSMM, prior to the effective date of this permit, then an additional assessment does not need to be performed. Inspections of flood management structures will be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and recorded within the City’s GIS layer or using a paper checklist. The field collection application and paper inspection checklist contain the same questions. A table listing the information

that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist are provided in Appendix D.

Retrofitting activities will be conducted as funding becomes available for their implementation. If retrofitting activities are conducted during the reporting period, the City will maintain documentation showing the status of the retrofitting and information about what retrofitting activities were conducted.

1.5.2. Measurable Goals

- Ensure 100% of new/proposed flood management projects (i.e, detention/retention ponds and water quality vaults) comply with the City's Stormwater Management Ordinance.
- Perform Water Quality Assessment for 100% of City-owned detention / retention ponds and water quality vaults within the 5-year permit period (unless a previous assessment was conducted using the 2016 GSMM and the City has documentation, in which case the assessment does not need repeated).
- Evaluate potential retrofitting, if applicable and as funding permits.

1.5.3. Schedule

- Each reporting period, 2022-2027.

1.5.4. Annual Report Documentation

- Number of plans reviewed where new/proposed flood management projects were assessed for water quality impacts during the reporting period.
- Documentation of all water quality assessments of existing flood management control structures that occurred during the reporting period and status of any retrofitting activities.
- Documentation of any water quality assessments conducted prior to April 12, 2022 of existing flood management control structures and status of any retrofitting activities (with the 2022 – 2023 Annual Report).
- For subsequent reporting periods, table listing the date and results of the assessment and the status of any retrofitting activities.

1.6. MUNICIPAL FACILITIES

1.6.1. Description

Bloomingtondale has developed a municipal facility inventory to document the location of each facility owned and/or maintained by the City with the potential to cause pollution, excluding any facilities that are addressed in Section 3.3.3 (Industrial Facilities). A copy of the City's Municipal Facility Inventory is provided in Appendix C. The inventory includes any municipal facilities owned by the City that are located in another jurisdiction that have the potential to cause pollution, if applicable. This inventory will be updated at least each reporting period.

City staff or their designated representatives will inspect 100% of inventoried municipal facilities within the 5-year permit period and at least one inspection will be conducted each reporting period. If more than five (5) municipal facilities are listed on the inventory, the City will inspect at least 5% of the municipal facilities each reporting period. Inspections of Municipal Facilities will typically be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer. For City staff that do not have the field collection application available and/or in situations when a field collection application cannot be used for other reasons, a paper copy version of the inspection checklist will be used to record the inspections. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist are provided in Appendix D.

If sites with needed improvements are identified, the appropriate department will be notified of the problem and a site re-inspection may be performed if deemed necessary. Records will be maintained on problems found and actions taken.

1.6.2. Measurable Goals

- Update the municipal facilities inventory each reporting period, if needed.
- Inspect 100% of inventoried facilities every 5 years, with at least one inspection conducted each reporting period. If there are more than five (5) municipal facilities on the inventory, 5% of the municipal facilities will be inspected each reporting period.
- Document site inspections using the Stormwater Site Inspection Checklist or GIS.

1.6.3. Schedule

- Each reporting period, 2022-2027.

1.6.4. Annual Report Documentation

- Copy of updated municipal facility inventory.
- Documentation of inspections conducted, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed inspection checklist for each municipal facility inspected during the reporting period.
- Documentation of any activities conducted to address issues identified during the site inspection.

1.7. PESTICIDE, FERTILIZER & HERBICIDE (PFH) APPLICATION

1.7.1. Description

1.7.1.A. Commercial Pesticide Applicator & Distributor Certification Program

The City of Bloomingdale relies on the Georgia Department of Agriculture (DoA) to address requirements for Pesticide Applicator/Distributor Training and Certification. The DoA requires commercial applicators of restricted use pesticides (including herbicides, insecticides, fungicides, plant growth regulators, and defoliants) to obtain and retain a “Commercial Pesticide Applicators License.” The DoA also requires that distributors of restricted use pesticides obtain and retain a “Pesticide Dealer’s License”. Continuing education units are required each reporting period to maintain the license.

Prior to issuing a business license, the City will require applicants who are likely to require a commercial pesticide applicators license to provide proof that they hold the appropriate State license.

1.7.1.B. Municipal PFH Program

The City of Bloomingdale utilizes herbicide application on roadside ditches on an occasional, as-needed basis. The City has developed a PFH Standard Operating Procedure (SOP), a copy of which is included in Appendix D. The City requires that the employees supervising the application of pesticide/herbicide be certified through the DoA program and that they participate in the continuing education requirements.

1.7.2. Measurable Goals

- Continue to utilize GDoA Program to certify commercial applicators and distributors within the City.
- Continue to adhere to the SOP when performing any landscape chemical application within the City.

1.7.3. Schedule

- Ongoing, 2022-2027.

1.7.4. Annual Report Documentation

- Documentation of any program activities conducted during the reporting period related to the chemical application of PFHs and/or documentation of DoA certification.

2. ILLICIT DISCHARGE DETECTION & ELIMINATION (IDDE)

Permit Section 3.3.2: Illicit Discharge Detection and Elimination Program (IDDE), Table 3.3.2

2.1. LEGAL AUTHORITY

2.1.1. Description

The City of Bloomingtondale has established legal authority through the City's local Stormwater Management Ordinance (Chapter 78, Article V) and Illicit Discharge Ordinance to prohibit illicit discharges and conduct an illicit discharge detection and elimination program. These ordinances prohibit illicit discharges to the public MS4, grants the City the authority to enter private property to investigate suspected illicit discharges, and also provides the City with the means to enforce violations of this ordinance. Copies of the City's Stormwater Management Ordinance and Illicit Discharge Ordinance are included in Appendix B.

2.1.2. Measurable Goals

- Evaluate the Illicit Discharge Ordinance each reporting period to determine if revisions are required.

2.1.3. Schedule

- Each reporting period, 2022-2027.

2.1.4. Annual Report Documentation

- Copy of Illicit Discharge Ordinance if revised during the reporting period.

2.2. OUTFALL INVENTORY & MAP

2.2.1. Description

The City of Bloomington has developed an outfall inventory and a map showing the location of all outfalls from the MS4 and the names and location of all waters of the State that receive discharges from those outfalls. In addition, the City has identified those outfalls that are continuously “wet” due to tidal activity or surcharge of the system, and those that are dry. A “wet” designation means that the invert of the outfall is below the mean high tide or static water level causing the drainage system to be flooded daily.

To view the map and inventory of the MS4 Outfalls, please see the Illicit Discharge Detection and Elimination (IDDE) Plan included in Appendix E. Each reporting period, the City will update the map and inventory to reflect the addition of outfalls from new infrastructure projects or developments and remove any outfalls that have been reclassified or removed.

2.2.2. Measurable Goals

- Maintain and update a map showing the location of all outfalls from the MS4, which outfalls are “wet”, and the names and location of all waters of the State that receive discharges from those outfalls.
- Maintain and update a database inventory of all outfalls from the MS4 within the City limits of Bloomington.

2.2.3. Schedule

- Each reporting period, 2022-2027.

2.2.4. Annual Report Documentation

- Updated inventory and map of the MS4 outfalls that identifies which MS4 outfalls are “wet”, with the names and locations of all waters of the State that receive discharges from those outfalls.
- Number of new outfalls added and total number of outfalls in the inventory

2.3. IDDE PLAN REVIEW IDDE PLAN

2.3.1. Description

The City of Bloomingtondale's IDDE Plan, approved on June 30, 2020, consists of a "wet" and "dry" MS4 outfall inventory and map; outfall reconnaissance inventory and field screening procedures (i.e., dry weather screening); a proactive IDDE inspection program; source tracing through field sampling, visual inspections, site inspections, upstream sampling, and/or dye testing; source removal; and data collection and reporting. The IDDE Plan, included in Appendix E of this Plan, will be used to determine if upstream facilities/connections are discharging non-stormwater flows to the drainage system and to eliminate all identified illicit discharges. An Outfall Reconnaissance Inventory Form and Source Tracing Form are provided in Appendix A of the IDDE Plan.

The City will perform inspections and/or dry weather screening of the MS4 outfalls within its current inventory in accordance with the procedures outlined in the IDDE Plan. The City will investigate any potential illicit discharges in accordance with the procedures in the IDDE Plan. Suspect or obvious illicit discharges require follow-up actions and activities, as specified in the IDDE Plan to determine the specific source(s) of contamination. Should the City positively identify any illicit discharges, the City will perform enforcement actions as dictated by the Illicit Discharge Ordinance, the IDDE Plan, and the City's Enforcement Response Plan (ERP) to remove positively identified illicit discharges. A copy of the City's updated ERP, originally approved on April 21, 2020, is included in Appendix F.

The City will screen at least 5% of the total number of stormwater outfalls listed on the City's most current each reporting period and 100% of the inventory of MS4 outfalls will be screened over the 2022-2027 five-year period.

2.3.2. Measurable Goals

- Dry weather screen 100% of all MS4 outfalls over a five-year period.
- Investigate and perform source tracing for 100% of suspected illicit discharges.
- Enforce the Illicit Discharge Ordinance, IDDE, and ERP for 100% of positively identified illicit discharges.

2.3.3. Schedule

- Ongoing, 2022-2027: Perform source tracing and enforce Illicit Discharge Ordinance as needed
- March 31, 2023 – Complete Screening in Area Sector 1
- March 31, 2024 – Complete Screening in Area Sector 2
- March 31, 2025 – Complete Screening in Area Sector 3
- March 31, 2026 – Complete Screening in Area Sector 4
- March 31, 2027 – Complete Screening in Area Sector 5

2.3.4. Annual Report Documentation

- Number and percentage of MS4 outfalls inspected during the reporting period.

- Map and documentation of inspections and dry weather screening, such as a table of individual inspection reports with a record for each outfalls inspected and the findings of that inspection, or a copy of the completed dry weather screening forms (Outfall Reconnaissance Inventory Form) for all MS4 Outfalls screened within the reporting period.
- Records of any source tracing or enforcement activities conducted as a result of dry weather screening activities.

2.4. SPILL RESPONSE PROCEDURES

2.4.1. Description

The City's Public Works Department maintains spill response materials onsite to respond to and cleanup minor chemical spills at municipal facilities, and checks for spill kits and spill response materials when conducting inspections of Highly Visible Pollutant Source (HVPS) facilities and Industrial facilities. Public Service workers are also responsible for reporting and cleanup of sanitary sewer spills.

The Bloomington Fire Department assumes the lead role in managing any hazardous materials spill incident within the City of Bloomington. The Fire Department is responsible for coordinating spill response efforts through the regional hazmat response team and other local, regional, and State entities responsible for spill mitigation. A Spill Prevention Plan included in Appendix D, has been developed as guidance to ensure the Fire Department adheres to proper spill response procedures. The Fire Department is responsible for ensuring its staff receive specialized spill response training, if needed.

Bloomington staff will maintain records of any spills that occur that may discharge to the MS4 and how those spills were resolved. Those records will be summarized and included in the Annual Report.

2.4.2. Measurable Goals

- Maintain documentation on any spill occurrences and cleanup performed through the City's Work Order database and/or City of Bloomington Fire Department records.

2.4.3. Schedule

- Each reporting period, 2022-2027.

2.4.4. Annual Report Documentation

- Documentation on any spill occurrences and cleanup performed.

2.5. PUBLIC REPORTING PROCEDURES

2.5.1. Description

The City of Bloomingdale has established procedures for addressing citizen complaints about water quality and reports of illicit discharges and illegal dumping. The City maintains a link on the City's official website that allows citizens and visitors to contact the City and report concerns, including illicit discharges and illegal dumping. The link to this page can be found on the City's webpage at <https://www.bloomington-ga.gov/contact>. Concerns reported through the City's website are entered into the City's Work Order Database and/or referred to the appropriate department for follow-up as needed.

The City's "Contact Us" webpage also provides a phone number to report stormwater pollution (912-748-0970) for residents to contact the City for any purpose including a request for service and/or to report illicit discharges to the storm sewer system. City administrative staff are responsible for receiving citizen complaint calls, and the caller's information is then passed to the Public Works Department, which is responsible for taking action to address calls that relate to water quality within two business days. The Public Works staff will record actions taken to address the complaint in the work order and return it to City Hall for filing, or, alternatively, maintain written documentation of response actions.

The City's Public Works Department maintains a database of all finished work orders related to potential illicit discharges, illegal dumping, and other water quality violations. Enforcement of City Code, when necessary, is referred to the City's Code Enforcement department, who will enforce the ordinances in accordance with the City's ERP, included in Appendix F.

2.5.2. Measurable Goals

- Promote, publicize and facilitate public reporting of illicit discharges through the City's website each reporting period.
- Investigate and take appropriate action for 100% of all IDDE/water quality related complaints received.
- Record IDDE/water quality-related complaints and actions taken in the City's Work Order Database.

2.5.3. Schedule

- Ongoing, 2022-2027: Update work order database as calls are received and take action for/document complaints received, as appropriate.
- Each reporting period, 2022-2027: Ensure stormwater webpage lists proper telephone number and contains a working link for electronic reporting of stormwater issues.

2.5.4. Annual Report Documentation

- Summary of the citizen complaints received, including documentation of complaints, investigations, complaint status, and actions taken during the reporting period.
- Documentation of illicit discharge public reporting promotion (such as a webpage screenshot).

2.6. PROPER MANAGEMENT & DISPOSAL OF USED OIL & TOXIC MATERIALS

2.6.1. Description

The City performs multiple activities to promote the proper management and disposal of used oil and toxic materials by the public. The following items can be recycled at various locations throughout the City and additional free standing recycling bins are available upon request as well:

- **Used Motor and Hydraulic Oil** - The City of Bloomingdale offer its citizens an environmentally safe way to get rid of their used motor oil and hydraulic oil. Citizens can bring used oil in a sealed, disposable container, to the City's Maintenance Shop located at 7 Adams Road, where it is transferred to a used oil container that is emptied by a waste recycling facility.
- **Metal Goods** - A container for the collection of metal goods is located inside the gate at the Bloomingdale Maintenance Shop at 7 Adams Road.
- **Used Batteries** - Used batteries may be brought to the City's Maintenance Shop and/or taken directly to Interstate Battery or O'Riley Auto Parks for recycling by citizens or by the City.
- **Automobile Tires** - Old tires may be brought to the City's Maintenance shop. The City collects the tires and sends them offsite to ALMA for recycling or disposal.

Information about how to recycle used oils and other wastes is provided on the City's Recycling Services webpage at <https://www.bloomingdale-ga.gov/copy-of-garbage-debris-recycling> that is accessible to City employees, commercial and industrial entities, and the general public. This webpage also includes a link to the Chatham County Resource Conservation Education Center website, which lists information to help citizens of the County, including those in the City of Bloomingdale, to dispose of hazardous wastes properly.

The City also educates the general public, commercial businesses, and industries about the importance of recycling used oils and toxic materials through other outreach efforts, which include:

- Educational information related to proper waste management and disposal is provided on the City's Stormwater webpage at <https://www.bloomingdale-ga.gov/storm-water-management>.
- The City of Bloomingdale maintains an inventory, updated each reporting period, of commercial businesses and facilities that are considered to be HVPSSs as well as industrial sites. HVPSSs and industrial facilities are routinely inspected by the City, and industry-specific educational literature, including literature about proper waste management and disposal, is provided if/as needed.
- Information about proper waste management is distributed seasonally, including disposal and recycling opportunities, within the City's newsletter and/or via social media to inform and educate the public. Information may also be placed in local newspapers such as the Spirit Newspaper.

Additional information about the City's Public Education and Involvement Programs, which includes relevant stormwater-related information including proper waste management and disposal, are discussed in Sections 9 and 10 of this Plan.

2.6.2. Measurable Goals

- Operate drop off-site for motor and hydraulic oil at the Maintenance Shop and properly recycle the wastes.
- Promote proper management and disposal of used oil and toxic materials by maintaining a web link to the Chatham County Resources Conservation website and/or by including educational information in City newsletters, social media, or through other educational outreach efforts.
- Provide industry-specific educational literature, including literature about proper waste management and disposal, during HVPS and Industrial Site inspections on an "as-needed" basis.

2.6.3. Schedule

- Ongoing, 2022-2027.

2.6.4. Annual Report Documentation

- Details of any activities performed during the reporting period including documentation of used oil recycling activities conducted by the City (such as an invoice or amount of used oil collected).
- Screenshot of the web link for the Chatham County Resource Conservation Education Center.
- Summary of and/or copies of industry-specific educational literature, including literature about proper waste management and disposal, distributed during HVPS and Industrial Site inspections.

2.7. SANITARY SEWER INFILTRATION CONTROLS

2.7.1. Description

The City of Bloomington currently implements an inspection program to determine if the sanitary sewer system has any leaks, damage, or cross connections with the storm sewer or drainage system. Inspections of the sanitary sewer system are routinely conducted and maintenance or capital improvements are performed, as needed. Maintenance may include repair, relining, or replacement of malfunctioning system elements. The City inspects the Main Street lift station routinely (typically on a daily basis), and will inspect sanitary lines or grinder pumps upon complaint, alarm, or other evidence of failure.

2.7.2. Measurable Goals

- Inspect Main Street lift station at least weekly.
- Inspect 100% of suspected sewage spills from the sanitary sewer system reported to or by Bloomington.
- Resolve 100% sanitary sewer overflows or cross connections.
- Record and maintain information on all sanitary sewer spills in a database.

2.7.3. Schedule

- Ongoing, 2022-2027.

2.7.4. Annual Report Documentation

- Documentation of Main Street lift station inspections (such as a log, etc.)
- Documentation of sanitary sewer spills and cleanup activities performed.

3. INDUSTRIAL FACILITIES STORMWATER DISCHARGE CONTROL

Permit Section 3.3.3: Industrial Facility Stormwater Discharge Control, Table 3.3.3

3.1. INDUSTRIAL FACILITY INVENTORY

3.1.1. Description

The City of Bloomingdale currently maintains an inventory of industrial facilities that discharge to the City's MS4. This list, provided in Appendix C, is based on a database posted on the Georgia EPD's website about facilities that have applied for coverage under the Industrial Storm Water General Permit (IGP) and/or submitted a No Exposure Exclusion (NEE) for permit exemption. Each reporting period, the City reviews the most recent listing of industrial sites posted to EPD's website and updates the Industrial Facility Inventory accordingly. The City will continue to modify and update this list in accordance with the informational sources listed above for inclusion in the City's Annual Report.

3.1.2. Measurable Goals

- Each reporting period review EPD database of industrial facility permittees and update Industrial Facility Inventory.

3.1.3. Schedule

- Each reporting period, 2022-2027.

3.1.4. Annual Report Documentation

- Updated Industrial Facility Inventory.

3.2. INDUSTRIAL STORMWATER INSPECTION PROGRAM

3.2.1. Description

The City of Bloomington will inspect 100% of the facilities on the City's industrial inventory list over the course of the five (5) year permit period (2022-2027) with a minimum of at least one industrial inspection conducted each reporting period. If more than five (5) industrial sites are listed on the City's inventory, the City will inspect a minimum of 5% of the industrial facilities each reporting period. The procedures listed below will be followed:

- City staff will first determine whether the industrial facility discharges to the City MS4. If the facility does not discharge to the City MS4, it will be removed from the Industrial Facility Inventory.
- City staff will check to ensure that the facility has submitted a NOI to be covered under the NPDES IGP, if it is required.
- City staff will perform a cursory review of the implementation status of the facility's associated Stormwater Pollution Prevention Plan (SWP3).
- Industrial site inspections may be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and recorded within the City's GIS layer or a paper copy version of the inspection checklist may be used to record the inspections. The field collection application and paper inspection checklist contain the same questions.
- A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist is provided in Appendix D.
- Educational literature, including literature about proper waste management and disposal and other relevant topics, may also be supplied at the time of the site inspection or as part of the follow-up to the site inspection on an "as-needed" basis.
- Should an inspection reveal a potential threat to water quality in the MS4, the Bloomington staff will notify the industry or business and provide them with a copy of the inspection checklist and/or relevant information. The City may request follow-up documentation and/or perform a re-inspection to ensure that all necessary corrections were made if deemed necessary.
- Enforcement of any identified illicit discharges will be handled in accordance with the City's Illicit Discharge Ordinance and ERP.
- If the violation is not corrected, EPD will be notified of the problem. The City will also notify EPD if assistance is needed for enforcement of the NPDES IGP or if there is a threat to Waters of the State. Bloomington may elect to perform water quality monitoring to monitor stormwater runoff and/or use monitoring data provided by the industrial facility in order to secure evidence to support the alleged violation.

- The City will maintain records of inspections results, problems found, and actions taken.

The City may perform one or more of the following steps if the City has reason to believe that an industrial facility is contributing a substantial pollutant load to the MS4:

- Identify any industrial facilities that are listed on the City's most current Industrial Facility Inventory, required by Permit Section 3.3.3.1, that have a discharge that drains to and is located within one (1) mile of an impaired waterbody listed on Georgia's latest approved 305(b)/303(d) List of Waters.
- If an industrial facility planned for inspection during the current reporting period discharges to and is located within one (1) mile of a listed impaired waterbody, the City will verify that the industrial facility discharges stormwater to the MS4 during the site inspection and will evaluate whether the industrial facility may be contributing a substantial pollutant load to the impaired stream. This evaluation may include any or all of the following: 1) a visual inspection of the outfall to identify possible evidence of pollutant discharges including discoloration, foam, floatables, odor, etc.; 2) a review of hazardous waste manifests; 3) a review of the facility's existing stormwater pollution prevention plan (SWPPP); 4) a review of material safety data sheets for materials located onsite; and/or 5) review monitoring data maintained by the industrial facility to determine if the facility may be discharging a pollutant(s) that are contributing to the impairment for which a Total Maximum Daily Load (TMDL) has been established for the impaired stream.
- If the City determines that the industrial facility may be discharging a substantial pollutant load to the MS4 and has conducted the monitoring required by the Industrial General Stormwater Permit, the City will provide the results of the monitoring conducted by the facility during the current reporting period in the Annual Report. If the City has evidence that the industrial facility is discharging a substantial pollutant load to the MS4 and has not conducted any water quality monitoring, the City will report this information in the Annual Report and also report this separately to the EPD. In extreme cases that pose a severe threat to the health or the environment, the City may elect to conduct water quality monitoring (or retain the services of a third-party contractor) and will submit the results of any monitoring activities it conducts or oversees for the industrial facility in the Annual Report.

3.2.2. Measurable Goals

- Inspect 100% of industrial facilities listed on the City's inventory over the 5-year permit period, and inspect at least one industrial site each reporting period, or, if there are more than five sites listed on the City's inventory, inspect at least 5% of the industrial facilities in the inventory each reporting period.
- Document site inspections and recommended corrective actions/violations.
- Enforce the Stormwater Management Ordinance, IDDE, and ERP as needed.

- If the City determines that the industrial facility may be discharging a substantial pollutant load to the MS4, provide the monitoring required by the Industrial General Stormwater Permit in the Annual Report and/or notify the EPD that the monitoring is not being conducted in the Annual Report and via separate notification.

3.2.3. Schedule

- Each reporting period, 2022-2027.

3.2.4. Annual Report Documentation

- Documentation of inspections, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed site inspection checklist for each Industrial facility inspected during the reporting period and any available follow-up documentation.
- Total number of facilities as well as the number and percentage of facilities inspected.
- Copy of monitoring results, if applicable.

3.3. ENFORCEMENT PROCEDURES

3.3.1. Description

If upon inspection, an industrial site is found to have issues that would be considered an illicit discharge, then the City will take enforcement action(s) as outlined in the City's Illicit Discharge Ordinance, ERP and in Sections 3.2 and 6 of this plan and document the actions.

If an illicit discharge has not taken place but practices onsite indicate a high probability that such a discharge could occur, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection and recommend corrective actions to address the potential issue. The City will also make the owner/operator aware of the Georgia Stormwater Management Manual (GSMM) and the Coastal Stormwater Supplement (CSS), which address pollution prevention and good housekeeping practices.

3.3.2. Measurable Goals

- Implement enforcement procedures when illicit discharge violations are discovered during inspections of industrial facilities.
- Document enforcement actions taken in violation/enforcement action log and/or other appropriate written documentation (letter to facility, copy of warning and/or Notice of Violation, etc.).

3.3.3. Schedule

- Ongoing, 2022-2027.

3.3.4. Annual Report Documentation

- Documentation of enforcement actions taken during the reporting period.

3.4. EDUCATIONAL ACTIVITIES

3.4.1. Description

The City will distribute the Georgia EPD's informational handout on the requirements of the NPDES IGP and/or other relevant stormwater best practices educational information to industrial facilities during site inspections on an as-needed basis. Relevant information for Industrial facilities will also be included on the City's stormwater webpage.

Additional information about the City's Public Education and Public Involvement Programs, including measurable goals and practices the City will use to educate industrial facilities, HVPSSs, and citizens about proper stormwater management practices, is discussed in Sections 9 and 10 of this Plan.

3.4.2. Measurable Goals

- Provide educational information, including EPD brochures and/or other relevant stormwater best practices educational information, to facilities listed on the City's Industrial Facility Inventory during inspections on an as-needed basis.
- Maintain educational material relevant to Industrial facilities on City website.

3.4.3. Schedule

- Each reporting period, 2022-2027.

3.4.4. Annual Report Documentation

- Summary of educational information distributed to industrial facilities and/or a copy of the educational literature.
- Web link for educational materials.

4. CONSTRUCTION SITE MANAGEMENT

Permit Section 3.3.4: Construction Site Management, Table 3.3.4

4.1. LEGAL AUTHORITY

The City of Bloomingdale has established legal authority to require and enforce appropriate erosion and sediment controls by adopting a Soil Erosion, Sedimentation and Pollution Control Ordinance (E&S Ordinance) that reflects the most recent amendments to the Georgia Erosion and Sedimentation Act (GESA). The City inserted its E&S Ordinance into Chapter 34, Article III of its Code of Ordinances, which was last revised on January 11, 2018. A copy of this ordinance is included in Appendix B. The City will review the E&S ordinance each reporting period and make revisions as needed to ensure appropriate erosion and sediment controls are in place at construction sites.

The City is currently a local issuing authority for LDA Permits as defined by GESA. Accordingly, the City administers the programs described below in accordance with the responsibilities related to being an issuing authority. EPD has taken the position that any program in compliance with the regulations of GESA will also be considered in compliance with those requirements of the NPDES Phase I MS4 program for Construction Site Structural and Non-Structural Controls.

4.1.1. Measurable Goals

- Each reporting period evaluate the E&S Ordinance to determine if revisions are required.

4.1.2. Schedule

- Each reporting period, 2022-2027.

4.1.3. Annual Report Documentation

- Copy of the updated ordinance if revisions are made during the reporting period.

4.2. SITE PLAN REVIEW PROCEDURES

4.2.1. Description

All qualifying developments are required to comply with the local E&S Ordinance and obtain an LDA Permit prior to the start of any land disturbing activities that will disturb one or more acres of land within the City limits. Commercial developments that will disturb less than one acre and phased developments that disturb a total of one acre or more are also required to receive an LDA Permit.

The City's E&S Ordinance requires submittal of approved Erosion, Sedimentation and Pollution Control Plan (ESPCP) prior to issuance of a LDA Permit. ESPCPs received by Bloomingdale are forwarded to the Georgia Soil and Water Conservation Commission (GSWCC) who review the plans for compliance with the requirements of the GESA and the Georgia Erosion and Sedimentation Control Manual. The ESPCP must be approved by the GSWCC prior to issuance of a LDA Permit by the City.

4.2.2. Measurable Goals

- Provide 100% of ESPCPs to GSWCC for their review and approval of compliance with GESA and the Bloomingdale E&S Ordinance.
- Grant LDA permits only after ESPCP is approved by GSWCC.
- Maintain a Site Plan Review database that summarizes the site plans received and the number of site plans reviewed, approved, or denied and a list or table of LDA permits issued during the reporting period.

4.2.3. Schedule

- Ongoing, 2022-2027.
- Each reporting period, 2022-2027: Prepare and submit Site Plan Review database.

4.2.4. Annual Report Documentation

- Number of site plans received, reviewed, approved, or denied during the reporting period.
- List or table of LDA Permits issued during the reporting period.

4.3. CONSTRUCTION SITE INSPECTION PROCEDURES

4.3.1. Description

The Bloomington Planning and Zoning Department is responsible for the inspection program that targets all construction projects within the city limits. The inspections include checking all E&S control measures for compliance with the approved E&S plans and LDA Permit. The authority for such inspections follows the City's E&S Ordinance. The City inspects construction sites in accordance with the following procedures:

- City staff will conduct site inspections of all sites that have an LDA Permit after land disturbing activities commence to verify compliance with all applicable E&S requirements.
- Once a site is under construction it will be inspected by the City on a regular basis until the site is stabilized, with at least one inspection completed during the reporting period.
- Inspections during the construction process will be prioritized as follows:
 - A significant rain event
 - Evidence of poor housekeeping
 - History of poor compliance
 - Evidence of absent or malfunctioning controls
 - Proximity to local waterways
- A final comprehensive site inspection will be conducted at all LDA Permit sites after land disturbing activities have ceased to ensure that the site has been adequately stabilized and that all excess materials have been removed.
- An E&S Inspection Checklist (Appendix D) will be completed during each inspection. A checklist is used so that all inspections are uniform, and also to provide the City and the Permit holder with a written record of the inspection findings.

4.3.2. Measurable Goals

- Inspect active construction sites with an LDA after installation of initial BMPs, during active construction, and after final site stabilization with at least one site inspection of each active site occurring during the reporting period.
- Complete and maintain E&S Inspection Checklists.
- Maintain a list of active construction sites.

4.3.3. Schedule

- Ongoing, 2022-2027: Inspect and document active construction sites.
- Each reporting period, 2022-2027: Prepare and submit list of active construction sites.

4.3.4. Annual Report Documentation

- List of active construction sites, including the number and dates of inspections conducted at each site. (All completed E&S checklists are maintained on file and can be provided upon request.)

4.4. ENFORCEMENT PROCEDURES

4.4.1. Description

If a site is found to be in violation of the City's ordinance during inspection, the City will issue a written warning to the violator. The violator will then have up to five (5) business days to correct said violation. After five (5) business days, a follow-up inspection by City representatives will take place to verify that corrective measures have been taken for previously documented deficiencies.

Following the third and each subsequent violation, an immediate stop-work order shall be issued. No work shall be allowed on the site except to address those deficiencies identified in the inspection and subsequent re-inspections.

Stop work orders shall be issued immediately without prior warnings if any of the following are identified on a site:

- Regulated land disturbing activities are being undertaken without a LDA Permit
- Failure to maintain a stream buffer
- Significant amounts of sediment as determined by the local issuing authority or by the director or their designee, have been or are being discharged into state waters and where best management practices have not been properly designed, installed, and maintained.

A detailed description of enforcement procedures regarding E&S violations is included in the City's E&S Ordinance in Appendix B as well as the ERP in Appendix F.

4.4.2. Measurable Goals

- Implement enforcement actions for 100% of identified violations in accordance with the E&S Ordinance and ERP.
- Maintain a construction site log of all violations and enforcement procedures undertaken during the reporting period, including the number and type (e.g. Notice of Violation, Stop Work Order), status (e.g. pending, resolved), and amount of any assessed penalties.

4.4.3. Schedule

- Ongoing, 2022-2027.

4.4.4. Annual Report Documentation

- Documentation of enforcement actions taken during the reporting period including the number, type, status and amount of assessed penalties.

4.5. CERTIFICATION

4.5.1. Description

GESA requires all local government employees involved with plan review, site inspections, or E&S Ordinance enforcement, as well as construction site operators to undergo the applicable training seminars developed by the GSWCC. The City requires all construction site operators to provide evidence in their LDA Permit application that they have received the appropriate certification. Evidence of site personnel certification must also be produced during an inspection, upon request. The City also requires all applicable staff to receive this training as soon as possible after the start of their employment and maintain active certifications.

4.5.2. Measurable Goals

- Provide all City employees involved in the E&S Program with applicable E&S training and certification.
- Ensure all construction site operators with LDP permits have applicable E&S certification.

4.5.3. Schedule

- Ongoing, 2022-2027.

4.5.4. Annual Report Documentation

- Documentation of current GSWCC certifications held by MS4 staff.

5. HIGHLY VISIBLE POLLUTANT SOURCES (HVPS)

Permit Section 3.3.5: Highly Visible Pollutant Sources (HVPS), Table 3.3.5

5.1. HVPS FACILITY INVENTORY

5.1.1. Description

The City maintains an inventory of commercial businesses and facilities that are considered to be highly visible pollutant sources (HVPS). A copy of the inventory is provided in Appendix C. For the 2022 – 2027 permit period, the City considers the following types of businesses to be HVPS:

- Auto Repair / Maintenance Facilities
- Gas Stations
- Landscape and Garden Related Businesses
- Pest Control Companies (that operate a commercial store, not a home-based business)
- Car Washes
- Vet Offices / Kennels

The City's HVPS inventory is reviewed and updated each reporting period based on changes to the business license database.

5.1.2. Measurable Goals

- Update the HVPS Inventory on an annual basis.

5.1.3. Schedule

- Each reporting period, 2022-2027.

5.1.4. Annual Report Documentation

- Updated HVPS Inventory.

5.2. HVPS STORMWATER INSPECTION PROGRAM

The City will inspect 100% of the facilities on the HVPS inventory over the course of the five (5) year permit period (2022-2027), with a minimum of at least one HVPS inspection conducted each reporting period. If more than five (5) HVPS facilities are listed on the City's inventory, the City will inspect a minimum of 5% of the HVPS facilities each reporting period.

A City inspector, or a qualified authority designated by the City, will visit the HVPS site and assess the condition and presence of stormwater pollutants onsite. City staff will inspect the site for evidence of stormwater pollution in the following areas and determine if there is any evidence of an illicit discharge:

- Areas around machinery and/or equipment
- Areas prone to leaks and spills
- Outdoor storage and handling areas
- Waste generation, storage, treatment and disposal areas
- Vehicle wash-down areas
- Fueling areas
- Loading and unloading areas

The following procedures will be followed during HVPS inspections and as follow-up to the inspections:

- All HVPS inspections will be documented. HVPS inspections will typically be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer. For City staff that do not have the field collection application available and/or in situations when a field collection application cannot be used for other reasons, a paper copy version of the HVPS inspection checklist may be used to record the inspections. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist is provided in Appendix D.
- Educational literature, including literature about proper waste management and disposal and other relevant topics, may also be supplied at the time of the site inspection or as part of the follow-up to the site inspection if needed.
- Should an inspection reveal a potential threat to water quality in the MS4, City staff will notify the industry or business and provide them with a copy of the inspection checklist and/or written notification of the issue if deemed necessary. The City may request follow-up documentation and/or perform a re-inspection to ensure that all necessary corrections were made if deemed necessary.
- Enforcement of any identified illicit discharges will be handled in accordance with the City's Illicit Discharge Ordinance, IDDE, and ERP.

- If the violation is still not corrected, the EPD may be notified of the problem. The City will also notify the EPD if assistance is needed for enforcement or if there is a threat to Waters of the State. The City may, during the investigation of a violation of the City's IDDE Ordinance, complete or require monitoring of a suspected HVPS in order to secure evidence to support the alleged violation.
- The City will maintain records of inspections results, problems found, and actions taken.

5.2.1. Measurable Goals

- Inspect 100% of HVPS facilities in the City's inventory over the 5-year permit period. Inspect at least one HVPS site each reporting period, or, if there are more than five sites listed on the City's inventory, inspect at least 5% of the HVPS facilities in the inventory each reporting period.
- Document site inspections and recommended corrective actions/violations.
- Enforce the Illicit Discharge Ordinance, IDDE, and ERP as needed.

5.2.2. Schedule

- Each reporting period, 2022-2027.

5.2.3. Annual Report Documentation

- Total number of HVPS facilities in the inventory.
- Total number and percentage of HVPS facility inspections conducted during the reporting period.
- Documentation of inspections, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed site inspection checklist for each HVPS facility inspected during the reporting period and any available follow-up documentation.

5.3. ENFORCEMENT PROCEDURES

5.3.1. Description

If an illicit discharge is identified during an HVPS site inspection, the City will initiate enforcement procedures as outlined in the City's Enforcement Response Plan (Appendix F) and maintain documentation.

If an illicit discharge has not taken place but practices on site indicate a high probability that such a discharge could occur, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection and recommend corrective actions to address the potential issue. The City will also make the owner/operator aware of the GSMM and the CSS, which address pollution prevention and good housekeeping practices.

Generally, the City will attempt to notify property owners / operators within 30 days of the initial inspection, if issues are discovered. Re-inspections will be performed on an as-needed basis during the reporting period to determine if corrective actions have been taken.

5.3.2. Measurable Goal

- Implement enforcement procedures for violations noted during HVPS inspections.
- Document enforcement actions taken in violation/enforcement action log and/or other appropriate written documentation (letter to facility, copy of warning and/or Notice of Violation, etc.).

5.3.3. Schedule

- Ongoing, 2022-2027.

5.3.4. Annual Report Documentation

- Documentation of enforcement actions taken on HVPS sites during the reporting period.

5.4. EDUCATIONAL ACTIVITIES

5.4.1. Description

The City will distribute information about stormwater best practices and related educational information to HVPS facilities during site inspections on an as-needed basis. Relevant information for HVPS facilities may also be included on the City's stormwater webpage. Additional information about the City's Public Education and Public Involvement Programs, including measurable goals and practices the City will use to educate industrial facilities, HVPSs, and citizens about proper stormwater management practices, is discussed in Sections 9 and 10 of this Plan.

5.4.2. Measurable Goals

- Maintain HVPS educational material on City website.
- Distribute HVPS educational material during facility inspections as needed.

5.4.3. Schedule

- Ongoing, 2022-2027: Maintain educational materials on website.
- Each reporting period, 2022-2027: Distribute educational materials during HVPS inspections.

5.4.4. Annual Report Documentation

- Copy of educational material distributed during HVPS inspections.
- Weblink for HVPS educational materials.

6. ENFORCEMENT RESPONSE PLAN (ERP)

Permit Section 3.3.6: Enforcement Response Plan (ERP)

6.1. ERP IMPLEMENTATION

6.1.1. Description

The City's Enforcement Response Plan (ERP) describes the actions taken for violations associated with the NPDES Permit and the SWMP. The ERP, located in Appendix F, details the City's responses to any noted stormwater violations, including escalating enforcement responses to address repeat and continuing violations. The plan details the ordinances providing legal authority, types of enforcement mechanisms available, escalation of enforcement, time frames for investigation, and the method to be used to track instances of non-compliance. Bloomington performed a comprehensive update of the ERP in 2020 that was reviewed and approved by EPD in April 2020.

The City will review the ERP each reporting period and revise, as necessary. If the ERP is revised, the City will submit it to EPD for review.

6.1.2. Measurable Goals

- Review the ERP each reporting period and update as needed.
- Take enforcement actions, as needed and appropriate.

6.1.3. Schedule

- Ongoing, 2022-2027: Take enforcement actions, as needed and appropriate.
- Each reporting period, 2022-2027: Review and update ERP, if necessary.

6.1.4. Annual Report Documentation

- Copy of revised ERP, if updates were completed during the reporting period.

7. IMPAIRED WATERS

Permit Section 3.3.7: Impaired Waters

At this time, the most recent approved Georgia 305(b)/303(d) List of Waters303(d) list of coastal streams shows that there are no waterways currently designed as “impaired” that are located within the jurisdictional boundary of Bloomingdale. Therefore, an Impaired Waters Plan (IWP) is not required.

The 2014 Georgia 305(b)/303(d) list for impaired stream segments formerly listed one stream segment of the Little Ogeechee River. The City prepared and implemented an IWP; however, that stream segment was later delisted and the City no longer monitors the stream segment or implements the IWP. The Little Ogeechee River is currently identified on the 2022 Georgia 305(b)/303(d) list as a waterway with an assessment pending.

The City will each reporting period review Georgia EPD’s updated 305(b)/303(d) list to identify waters not supporting their designated use within the jurisdiction. If any impaired waters are identified, including the Little Ogeechee River, the City will prepare a revised IWP for the pollutant(s) of concern and submit a copy of the document to EPD for approval. Following approval of the IWP, the Plan will be implemented and a copy will be incorporated into the SWMP.

7.1.1. Measurable Goals

- Conduct annual review of the most recently-approved 305(b)/303(d) list, and prepare IWP, if required.

7.1.2. Schedule

- Each reporting period, 2022-2027.

7.1.3. Annual Report Documentation

- Copy of Plan (if required to develop).
- Summary of monitoring data, any water quality trends, and plan implementation activities conducted during the previous reporting period.

8. MUNICIPAL EMPLOYEE TRAINING

Permit Section 3.3.8: Employee Municipal Training

8.1.1. Description

The City of Bloomington conducts quarterly safety meetings attended by all City employees, including employees who work in any municipal facility or function that has the potential to contribute pollutants to the MS4. A variety of stormwater-related topics, such as proper waste management practices, and stormwater pollution prevention measures, as well as environmentally-sound City operational policies, are discussed at the quarterly meetings.

The City will conduct annual employee training for employees responsible for implementation of the SWMP during quarterly safety meetings and/or during a separate training event. Training may be provided via powerpoint presentations or videos or, alternatively, the City may send employees offsite to an applicable training course. City employees will be trained during each permit period on stormwater topics that are necessary for that employee to do their job, including such topics as good housekeeping, IDDE, industrial and HVPS inspections, E&S inspections, Green Infrastructure/Low Impact Development (GI/LID) and/or pollution prevention procedures. The City will keep records of the training including the training agenda and/or materials, training date(s), as well as a list of attendees.

8.1.2. Measurable Goals

- Provide annual stormwater training for applicable employees.
- Document stormwater training activities.

8.1.3. Schedule

- Each reporting period, 2022-2027.

8.1.4. Annual Report Documentation

- Documentation of training activities, including a summary of training materials or training agenda.
- Copy of sign-in sheets or other documentation showing the name and number of training attendees and the date of training.

9. PUBLIC EDUCATION

Permit Section 3.3.9: Public Education

9.1. STORMWATER WEBPAGE

9.1.1. Description

The City of Bloomingdale maintains a Stormwater webpage on the City’s official website that contains information on stormwater management issues. The webpage can be accessed at <https://www.bloomingdale-ga.gov/storm-water-management>. The webpage includes information on how to prevent stormwater pollution, illicit discharges and dumping, and a number/link to report illegal dumping, illicit discharges and other stormwater problems. The City also maintains a tab on its main webpage that allows citizens and visitors to report concerns, including illicit discharges and illegal dumping. The City has added a “counter” to the stormwater webpage so that it can determine how many visits or “hits” there have been for the stormwater webpage.

The City will continue to maintain a Stormwater webpage and will update the stormwater webpages on an annual basis to provide new stormwater-related information and links as necessary. The City will also continue to monitor “hits” to determine how many people visit the webpage each reporting period.

Webpage updates may include, but are not limited to, adding/revising information about topics such as:

- Information on stormwater issues and stormwater pollution prevention
- Notifications about local educational programs, workshops and public meetings
- Links to educational brochures and programs intended to protect water quality
- Good housekeeping practices
- IDDE
- Industrial and HVPS-related information, and/or
- Green Infrastructure/Low Impact Development (GI/LID).

9.1.2 Measurable Goals

- Maintain stormwater webpage each reporting period and update as needed
- Record the number of webpage hits using a tracker, such as Google Analytics or other comparable counting mechanism.

9.1.3. Schedule

- Each reporting period, 2022-2027.

9.1.4. Annual Report Documentation

- Screenshot of current webpage and/or summary of webpage changes.
- Number of visits record by the website counter.

9.2. WATER UTILITY BILL HEADER/INSERT

9.2.1. Description

In order to reach the widest audience possible, the City will include educational information on stormwater issues in at least one water utility bill during each reporting period that reaches all City customers. The City may opt to include a utility bill stuffer/insert or to put an educational message in the utility bill header. Educational topics may include:

- Advertising the link to the City's Stormwater Webpage
- Information about citizen involvement opportunities
- Nonpoint source pollution and its impact on waterways and wildlife
- Information about how to report illicit discharges and illegal dumping
- Tips to prevent stormwater pollution & illicit discharges and properly manage wastes, such as information about litter reduction; pet waste management; and disposal of fats, oils & greases
- GI/LID practices and techniques
- Proper application practices for pesticides, fertilizers, and herbicides
- Good housekeeping and stormwater pollution prevention practices for commercial establishments
- Septic tank system maintenance

9.2.2 Measurable Goals

- Include educational message or educational insert in the City's water utility bills.

9.2.3 Schedule

- Each reporting period, 2022-2027.

9.2.4 Annual Report Documentation

- Copy of the water utility bill with educational message or a copy of the educational insert.

9.3. PUBLIC EDUCATION OUTREACH

9.3.1 Description

The City of Bloomington has developed a comprehensive public stormwater education program to educate citizens and business owners about the importance of stormwater pollution prevention. Educational activities include, but are not limited to, distributing educational brochure and fliers at City Hall and during outreach events, social media postings, sending educational “blasts” through the City’s website, and publishing educational information in the local newspaper.

The City will conduct at least one dedicated public stormwater educational outreach activity from the list below in Section 9.3.2 each reporting period to educate the public about stormwater topics and maintain documentation of the event. This may include information about the educational topics listed above in Sections 9.1.1 and 9.2.1 of this Plan or other relevant stormwater topics selected by the City.

9.3.2 Measurable Goals

Perform at least one of the following educational outreach activities each reporting period:

- a. Stock educational brochure(s) at City Hall for citizen pickup.
- b. Distribute educational brochures at City events, such as festivals and other public events.
- c. Social media posting at least once per reporting period.
- d. Send educational “blast” to citizens through City website, or
- e. Publish an educational insert in a local newspaper or City newsletter.

9.3.3 Schedule

- Each reporting period, 2022-2027.

9.3.4 Annual Report Documentation

The following documentation for the selected public outreach event will be provided:

- Tracking database showing the name and number of educational brochure(s) distributed at City Hall and a copy of the brochure/flier.
- Tracking database showing the name and number of educational brochure(s) distributed at a public City event and a copy of the brochure/flier.
- Screenshot of the social media posting and/or copy of the information that was posted via social media.
- Screenshot or copy of educational “blast” sent to citizens through City website, or
- Copy and date of educational insert published in newspaper or City newsletter.

10. PUBLIC INVOLVEMENT PROGRAM

Permit Section 3.3.10: Public Involvement

10.1. PUBLIC INPUT & REPORTING

10.1.1. Description

The City of Bloomington will invite the public to provide input on the SWMP by posting a copy of the draft document (before finalization and transmittal to the EPD) and/or copy of the approved SWMP (after EPD approval) as well as the City's most recent MS4 Annual Report transmitted to the EPD on the City's stormwater webpage. The webpage will contain a link that will allow the public to submit comments to the City on the proposed best management practices included within the SWMP as well as on the activities summarized in the Annual Report. The City will incorporate any needed revisions to the SWMP, and address any comments provided on the Annual Report in the next Annual Report submitted to the EPD, or within the SWMP, if applicable.

The City will also maintain a link on the City's Stormwater webpage that allows citizens and visitors to contact the City and report concerns, including illicit discharges and illegal dumping. Concerns reported through the City's webpage will be entered into the City's Work Order Database and/or referred to the appropriate department for follow-up as needed.

10.1.2. Measurable Goals

- Post the City's draft SWMP update or final SWMP (once approved by EPD) on the Stormwater webpage.
- Post the latest Annual Report submitted to the EPD on the Stormwater webpage.
- Maintain a link on the City's stormwater webpage that allows citizens and visitors to report concerns, illicit discharges and/or illegal dumping.

10.1.3. Schedule

- Each reporting period, 2022-2027.

10.1.4. Annual Report Documentation

- A summary of comments received by the City on the SWMP or Annual Report and a description of how they were addressed.
- Documentation of SWMP and AR posting to City website (such as a screenshot).
- Summary of the citizen complaints received, including documentation of complaints, investigations, complaint status, and actions taken during the reporting period.
- Documentation of illicit discharge public reporting promotion (such as a webpage screenshot).

10.2 BRING ONE FOR THE CHIPPER

10.1.1 DESCRIPTION

The City of Bloomington will participate in a “Bring One for the Chipper” event to encourage people to properly dispose of their Christmas trees. The City will host the annual event where residents can bring in old Christmas trees to be chipped and recycled into mulch. The mulch is then for use by residents at no charge. The City will advertise the event through the City’s website, social media, or other methods, and maintain documentation that the event was held.

10.1.2 Measurable Goals

- Hold one Bring One for the Chipper event per reporting period within the City of Bloomington.

10.1.3 Schedule

- Each reporting period, 2022-2027.

10.1.4 Annual Report Documentation

- Documentation of the event advertisement to residents (such as a screenshot and/or copy of the press release or event flier).
- Documentation that the event was held (such as photographs, the number of trees collected and recycled into mulch, etc.).

10.3 PUBLIC INVOLVEMENT OUTREACH

10.3.1 Description

The City of Bloomington provides many opportunities to solicit citizen input and encourage the public to help protect stormwater quality and reduce nonpoint source pollution through City events and participation in community programs. Public involvement outreach activities may include hosting community events open to the public, an annual community clean-up event, and/or participating in a native plant sale that is open to City residents.

The City will conduct at least one dedicated public stormwater involvement outreach activity from the list below in Section 10.3.2 each reporting period to involve the public with administration of the City's stormwater program. The City will advertise the event through the City's website, social media, or other methods, and maintain documentation that the event was held.

10.3.2 Measurable Goal

- Perform at least one of the following public involvement outreach activities each reporting period:
 - a. Operate a recycling / waste collection event (for hard-to-recycle items such as printer ink cartridges and/or batteries, etc.) at a City-sponsored event open to the general public or at City Hall.
 - b. Host a clean-up event within the City that is open to citizen participation.
 - c. Participate in a Native Plant Sale to encourage City residents to plant native vegetation and reduce water use.

10.3.3 Schedule

- Each reporting period, 2022-2027.

10.3.4 Annual Report Documentation

- Documentation of the event advertisement to Bloomington residents (such as a screenshot and/or copy of the press release or event flier).
- Documentation the event was held (such as photographs, the quantity of wastes/recyclables collected at the event, landfill receipt, etc.).

11 POST CONSTRUCTION

Permit Section 3.3.11: Post-Construction

11.1 POST CONSTRUCTION STORMWATER CONTROLS

11.1.1 Description

The City of Bloomington has established adequate legal authority through the City's Code of Ordinances, [*Chapter 78 –Utilities; Article V: Stormwater Management*](#) to address stormwater runoff into the MS4 from new development and redevelopment projects, ensure controls are in place to prevent or minimize water quality impacts, and pursue enforcement. The City's Stormwater Management Ordinance is provided in Appendix B.

The City's Stormwater Management Ordinance requires the use of post-construction stormwater management and site planning and design criteria to protect stormwater from negative impacts associated with land development, including the stormwater design criteria established in the Coastal Stormwater Supplement (CSS) and the Georgia Stormwater Management Manual (GSMM). The regulations require performance standards consistent with Section 3.3.11(a)(2) of the Permit for all new development and redevelopment that creates or adds more than 5,000 square feet of impervious surface or that involves land disturbing activities of 1 acre or more, including projects less than 1 acre if they are part of a larger common plan of development or sale. This Division also required developments to utilize the standards, criteria, and information presented in the latest edition of the CSS, the GSMM, and any relevant local addenda, for the proper implementation of this division.

The City will apply their adopted performance standards during the design of City construction projects, with the possible exception of linear projects. If the City designs a linear construction project, for which it would be impossible to apply the performance standards, the City will develop a feasibility program which sets reasonable criteria for determining when implementing performance standards for linear projects is infeasible. This will be submitted to EPD, and applied to future linear construction projects only upon approval.

The City will continue to review its Stormwater Management Ordinance each reporting period and revise it as needed to ensure appropriate post-construction stormwater controls are in place.

11.1.2 Measurable Goals

- Each reporting period evaluate the Stormwater Management Ordinance for post construction stormwater runoff control requirements to determine if revisions are required.
- Update the ordinance, if required.
- Enforce the use of the Stormwater Management Ordinance for applicable development and redevelopment.

- If and when needed, develop linear project feasibility program to apply to future linear projects.

11.1.3 Schedule

- Ongoing, 2022-2027: Enforce the use of the Stormwater Management Ordinance.
- Each reporting period, 2022-2027: Review and update Ordinance if necessary.

11.1.4 Annual Report Documentation

- Updated Stormwater Management Ordinance if revised during the reporting period.
- If developed, linear project feasibility program.

11.2 GREEN INFRASTRUCTURE/LOW IMPACT DEVELOPMENT (GI/LID)

Permit Section 3.3.11: Post-Construction, Table 3.3.11(b)

11.2.1 Legal Authority

11.2.1.1 Description

The City of Bloomington performed a comprehensive assessment of its existing codes in June 2021 at EPD's request to determine if there were any codes that presented an obstacle to the use of GI/LID practices for stormwater management. The City utilized the 2017 Code and Ordinance Worksheet developed by the Center for Watershed Protection (CWP), based on EPD's recommendation. The City previously performed a similar assessment in 2012 using the 2012 Code and Ordinance Worksheet developed by the CWP. Copies of both the 2012 and 2021 assessments are provided in Appendix G.

During the 2022 – 2023 reporting period, the City will ensure that a comprehensive review of building codes, ordinances, and other applicable regulations has been performed of existing codes using the most updated Code and Ordinance Worksheet developed by the CWP, the Water Quality Scorecard developed by the Environmental Protection Agency (EPA) or another comprehensive code evaluation tool. If there have been no changes to the City's existing ordinances and/or the CWP has not issued updated worksheets (i.e., the 2017 forms are still the most current forms), the City will re-assess the 2021 code evaluation and determine if another update is needed.

For the remainder of the 2022-2027 permit period, the City will each reporting period review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration, and document the assessment. The City will assess those regulations governing residential and commercial development, road design, land use, and parking requirements. During the regulatory review, the City will also consider the inclusion of incentives for use of GI/LID practices into the ordinance.

11.2.1.2 Measurable Goals

- Perform and/or document a comprehensive review during the 2022 – 2023 permit period using the most updated CWP's Code and Ordinance Worksheet, EPA Scorecard, or another comprehensive code evaluation tool. If there have been no changes to the City's existing ordinances and/or the CWP has not issued updated worksheets (i.e., the 2017 forms are still the most current forms), the City will re-assess the 2021 code evaluation and determine if another update is needed.
- Thereafter, each reporting period review City ordinances, building codes, and other regulations to determine if they impede GI/LID approaches.

11.2.1.3 Schedule

- Each reporting period, 2022-2027.

11.2.1.4 Annual Report Documentation

- Copies of any updated code(s), if revisions were made.
- Documentation of the comprehensive regulatory review or re-assessment of the 2021 code evaluation.

11.2.2 GI/LID Program

11.2.2.1 Description

The City of Bloomington has developed and implemented a GI/LID Plan that addresses procedures for evaluating the feasibility and site applicability of different GI/LID techniques, allowable GI/LID structures, and procedures for the inspection and maintenance of the GI/LID structures.

Revisions to the City's GI/LID Plan were submitted to EPD during the former 2017-2022 permit period and approved by the EPD in April 2021. A copy of the City's most recently revised GI/LID Plan is included in Appendix G. The City will each reporting period review the GI/LID Program and make changes as needed.

11.2.2.2 Measurable Goals

- Review the GI/LID Plan each reporting period and make updates as needed.
- Implement the approved GI/LID Plan.

11.2.2.3 Schedule

- Each reporting period, 2022-2027: Review GI/LID Plan, and update as needed.
- Ongoing, 2022-2027: Implement GI/LID Plan.

11.2.2.4 Annual Report Documentation

- Copy of updated GI/LID Plan, if revised.

11.2.3 GI/LID Structure Inventory

11.2.3.1 Description

Currently, no GI/LID structures (as identified by the City within its GI/LID Plan) have been constructed within City limits. Bloomington considers the following to be GI/LID structures:

- Bioretention Areas / Rain Gardens
- Dry Enhanced Swale (Bioswale)
- Green Roofs
- Rainwater Harvesting
- Vegetated Filter Strip
- Permeable pavement (pervious concrete, porous asphalt, concrete grid pavers, permeable interlocking pavers, plastic grid pavers, etc.)

The City has prepared an inventory of water quality-related GI/LID structures to track the addition of any GI/LID structures. A copy of the inventory is included in Appendix G. Ownership categories listed on the inventory include:

1. City-owned structures and/or structures that are the operational responsibility of the City;
2. Structures that are owned by a public entity other than the City (such as the Board of Education and other entities not covered by an NPDES permit); and
3. Privately-owned, non-residential GI/LID structures constructed after the date of the City's current permit (April 12, 2022).

New GI/LID structures added during new development/redevelopment will be identified through the site plan development process, and the City will update the GI/LID inventory during each reporting period if new structures were added. The City will also ensure that maintenance agreements are executed for all new non-permittee owned structures constructed after the effective date of the City's current permit (April 12, 2022).

11.2.3.2 Measurable Goals

- Identify new GI/LID structures during site plan review.
- Update the inventory with new GI/LID structures, if needed.
- Ensure maintenance agreements are executed for all new non-permittee owned GI/LID structures constructed after April 12, 2022.

11.2.3.3 Schedule

- Each reporting period, 2022-2027.

11.2.3.4 Annual Report Documentation

- Most recent GI/LID Inventory, including the type, ownership, and total number of structures.

11.2.4 Inspection and Maintenance Program

11.2.4.1 Description

Inspections

City staff or their designated representatives will inspect 100% of inventoried GI/LID structures within the 5-year permit period and at least one inspection will be conducted each reporting period. If more than five (5) GI/LID structures are listed on the inventory, the City will inspect at least 5% of the structures each reporting period. Inspections will be documented using the inspection sheets included within the City's GI/LID Plan (Appendix G).

Inspections will be documented using the inspection sheets included within the City's GI/LID Plan (Appendix G) or through a field collection application that is downloaded on City-owned smart phones and/or tablets and recorded within the City's GIS layer. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and copies of paper inspection checklists (contained within the GI/LID Plan) are provided in Appendix D and G, respectively.

Maintenance

In order to ensure that private, non-residential GI/LID structures and publicly-owned structures owned by other entities are maintained by their owner in accordance with the CSS, the City requires developers of GI/LID structures not owned by the City to complete an Inspection & Maintenance Agreement with the City, prior to the issuance of an LDA permit. The Inspection & Maintenance Agreement and stormwater management design plan is approved by the City and recorded with the deed upon approval during the site plan review process. The Inspection & Maintenance Agreement, a model of which is included as an attachment to the GI/LID Plan in Appendix G, details the following information:

- The person(s) responsible for carrying out the inspection and maintenance.
- A maintenance schedule stating when and how often routine inspection and maintenance will occur.
- Plans for annual inspections to ensure proper performance of the stormwater management system between scheduled maintenance.

The City will retain copies of maintenance agreements finalized after the effective date of the current permit (April 12, 2022) and develop a summary list of the new agreements. This list will also include any maintenance agreements that were obtained for GI/LID structures constructed in previous permit periods. The summary list will be reviewed and updated each reporting period.

During routine inspections, if the City staff determine that the owner is not properly maintaining their GI/LID structures, they will enforce the provisions of the Inspection & Maintenance Agreement and the Stormwater Management Ordinance.

11.2.4.2 Measurable Goals

- Inspect 100% of inventoried structures every 5 years, with at least one structure inspected each reporting period. If there are more than five (5) structures on the inventory, 5% of the structures will be inspected each reporting period.
- Document inspections on the City's approved inspection checklists.
- Conduct maintenance of City-owned structures as needed.
- Ensure maintenance of structures not owned by the City is conducted in accordance with the Inspection & Maintenance Agreement.
- Enforce provisions of the Inspection & Maintenance Agreement and the Stormwater Management Ordinance.
- Retain copies of new maintenance agreements and maintain/update a summary list of maintenance agreements.

11.2.4.3 Schedule

- Each reporting period, 2022-2027.

11.2.4.4 Annual Report Documentation

- Number and percentage of GI/LID structures inspected and maintained during the reporting period.
- Documentation of inspections conducted, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed inspection checklist for each structure inspected during the reporting period.
- Summary and/or documentation of any maintenance and/or enforcement activities conducted to address issues identified during the GI/LID inspections.
- Updated summary list of Inspection & Maintenance Agreements.