

## **STORM WATER MANAGEMENT PROGRAM FORT GORDON, GEORGIA**

**General NPDES Permit No. GAG480000 for  
Small Municipal Separate Storm Sewer Systems (MS4) at Military Facilities**



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#### **ABBREVIATIONS AND ACRONYMS**

SWMP	Storm Water Management Program
MS4	Municipal Separate Storm Sewer System
IDDE	Illicit Discharge Detection and Elimination
BMP	Best Management Practice
MCM	Minimum Control Measure
DPW	Directorate of Public Works
GA-EPD	Georgia Environmental Protection Division
GIS	Geographic Information System
NPDES	National Pollutant Discharge and Elimination System
ES&PC	Erosion Sedimentation and Pollution Control
LDA	Land Disturbing Activity
GSWCC	Georgia Soil and Water Conservation Commission
O&M	Operation and Maintenance
GI	Green Infrastructure
LID	Low Impact Development
EPA	Environmental Protection Agency
Base Ops	Base Operations

**STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES  
ENVIRONMENTAL PROTECTION DIVISION**

**Storm Water Management Program (SWMP)**

General NPDES Permit No. GAG480000 for  
Small Municipal Separate Storm Sewer Systems (MS4) at Military Facilities

**1. General Information**

**A. Name of small MS4:** US Army Garrison Fort Gordon

**B. Ownership Status:**

- Check the military branch having ownership of the MS4:
  - a. ☐ Air Force
  - b. ☒ Army
  - c. ☐ Marine
  - d. ☐ Navy
  - e. ☐ Georgia National Guard
- If the operator of the MS4 is different from the owner, provide the name of the operator: N/A

**C. County where MS4 is located:** Richmond

**D. Name of responsible official:** Colonel Samuel G. Anderson  
**Title:** Garrison Commander  
**Mailing Address:** 307 Chamberlain Avenue  
**City, State, Zip Code:** Fort Gordon, GA 30905  
**Telephone Number:** 706-791-6300

**E. Designated storm water management program contact:**

**Name:** John L. Ramey  
**Title:** Director of Public Works  
**Mailing Address:** 515 15th Street (Building 14500)  
**City, State, Zip Code:** Fort Gordon, GA 30905  
**Telephone Number:** 706-791-3225  
**Email Address:** [john.l.ramey2.civ@mail.mil](mailto:john.l.ramey2.civ@mail.mil)

## 2. Sharing Responsibility

- A. Has another entity agreed to implement a control measure on your behalf?

Yes \_\_\_\_\_ No   x   (If no, skip to Part 3)

Control Measure or BMP:

- Name of entity \_\_\_\_\_
- Control measure or component of control measure to be implemented by entity on your behalf: \_\_\_\_\_

- B. Attach an additional page if necessary to list additional shared responsibilities. **It is mandatory that you submit a copy of a written agreement between your MS4 and the other entity demonstrating written acceptance of responsibility.**

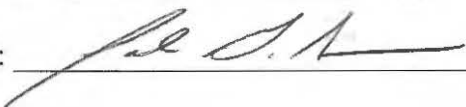
## 3. Minimum Control Measures (MCM) and Appendices

- **MCM #1** Public Education and Outreach
- **MCM #2** Public Involvement/Participation
- **MCM #3** Illicit Discharge Detection and Elimination (IDDE)
- **MCM #4** Construction Site Storm Water Runoff Control
- **MCM #5** Post-Construction Storm Water Management in New Development and Redevelopment
- **MCM #6** Pollution Prevention/Good Housekeeping
  
- Appendix A Impaired Waters Plan
- Appendix B Educational Materials and Outreach Items
- Appendix C Examples of the Green Matters Newsletter
- Appendix D Installation Clean Up Days Spreadsheet
- Appendix E Stormwater Phone Log and Tracking Sheets
- Appendix F IDDE Dry Weather Screening Procedures
- Appendix G Storm Water Outfalls and Receiving Stream Map, Outfall Inventory, and Storm System Map Book.
- Appendix H Food Service Fact Sheet
- Appendix I Stormwater Permitting for Construction Sites on Fort Gordon
- Appendix J Stormwater Construction Inspection Form Packet
- Appendix K Copy of GSWCC Certification Cards of Fort Gordon Staff Members
- Appendix L Post Construction Storm Water Quality Permit Requirements
- Appendix M Storm Water Operation and Maintenance Manual
- Appendix N Storm Water Training Presentations
- Appendix O Street Sweeping Quarterly Technical Exhibit

#### 4. Certification Statement

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

Printed Name: Samuel G. Anderson Date: 12/18/14

Signature:  Title: Garrison Commander

## **Minimum Control Measure # 1 - Public Education and Outreach on Storm Water Impacts**

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

### **See Table 4.2.1(a) of the Permit**

#### **A. Best Management Practice (BMP) #1**

**1. Target audience:**

- Installation residents and employees.

**2. BMP Title:**

- Educational Fact Sheets and Other Materials.

**3. Description of BMP:**

- Prepare fact sheets and other materials related to the storm water program for distribution. Promotional items will be produced and distributed to the public during events such as Oktoberfest, Earth Week, and visits to Freedom Park Elementary School. Storm water, IDDE, and Fats Oils and Grease brochures will also be provided to the housing office for inclusion in the New Tennant Welcome Packages.

**4. Measurable goal(s):**

- The installation will distribute at least fifty (50) storm water fact sheets and other materials including IDDE and pollutant reduction brochures, coloring books, rulers, and pens made of recycled material at each outreach function the environmental office supports. The environmental office usually supports three or four events a year including Oktoberfest, Earth Week, Month of the Military Child, and Freedom Park Elementary School visits. Documentation to be submitted with each annual report:
- Copies of the educational materials and public outreach items will be submitted in the annual report. The number of materials distributed at each event will be tracked and presented in the annual report. Examples of the materials and outreach items are available in Appendix B.

**5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

**6. Person (position) responsible for overall management and implementation of the BMP:**

- Directorate of Public Works (DPW) Environmental Team Member (Public Education Lead).

**7. Rationale for choosing BMP and setting measurable goal(s):**

- Informing the public with this material will help to ensure compliance. The goals for the number of materials and targets of materials are dictated by the population of the base.

## **B. BMP #2**

1. **Target audience:**
  - Installation residents and employees.
2. **BMP Title:**
  - Green Matters Newsletter.
3. **Description of BMP:**
  - A monthly newsletter will be produced by DPW Environmental staff and distributed to all residents and employees of the installation. A copy will be placed in no less than seven (7) common areas where information is distributed and copies will be given out at DPW sponsored events. The newsletter will cover a number of environmental concepts including but not limited to articles on storm water, water quality, and MS4 related topics.
4. **Measurable goal(s):**
  - Produce twelve (12) newsletters a year for installation-wide distribution.
5. **Documentation to be submitted with each annual report :**
  - Copies of the Green Matters Newsletters will be provided in the annual report. Examples of the newsletter can be found in Appendix C.
6. **Schedule:**
  - Interim milestone dates (if applicable): Monthly
  - Implementation date (if applicable): January, 2015
  - Frequency of actions (if applicable): Monthly
  - Month/Year of each action (if applicable): Monthly
7. **Person (position) responsible for overall management and implementation of the BMP:**
  - DPW Environmental Team Member (Public Education Lead).
8. **Rationale for choosing BMP and setting measurable goal(s):**
  - Informing the public with this newsletter will help to ensure compliance. The goals for the number of materials and targets of materials are dictated by the population of the base.

**Note:** At a minimum, the MS4 must include a BMP in the SWMP for each BMP listed in the NPDES Permit. For those MCMs without specific BMPs listed in the permit, the MS4 should implement at least two (2) BMPs for each MCM. If additional BMPs are chosen, then you should attach an additional sheet for each BMP.

## **Minimum Control Measure #2 - Public Involvement/Participation**

40 CFR Part 122.34(b)(2) Requirement: The permittee must, at a minimum, comply with state and local public notice requirements when implementing a public involvement/ participation program.

**See Table 4.2.2 (a) of the Permit**

### **A. BMP #1**

**1. Target audience/stakeholder group:**

- Installation residents and employees.

**2. BMP Title:**

- Installation Clean-Up Days.

**3. Description of BMP:**

- Fort Gordon hosts two installation clean-up days a year, one in the spring and one in the fall. The majority of the tenants and units on base participate along with civilian and family member volunteers. Each group is assigned an area of the cantonment to walk and pick up all litter. Areas include but are not limited to open storm water swales and ditches, any small creeks and streams, and inlets to the MS4. Roll off dumpsters are staged in central locations so groups can deposit the debris collected for disposal.

**4. Measurable goal(s):**

- Continue Installation Clean-up days twice a year.

**5. Documentation to be submitted with each annual report:**

- Spreadsheets of the units participating in the installation Clean-up days will be submitted along with the totals of debris collected. An example of the unit spreadsheet is available in Appendix D.

**6. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Bi-annually
- Month/Year of each action (if applicable): N/A

**7. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Team Member.

**8. Rationale for choosing BMP and setting measurable goal(s):**

- Involving the public in the education process enhances the message of proper storm water quality assurance. The number of events will be dictated by the installation command; however, there will be at least two a year.

## **BMP #2**

1. **Target audience/stakeholder group:**
  - Installation residents and employees
2. **BMP Title:**
  - Storm Water Support Phone Line
3. **Description of BMP:**
  - Implement a storm water support telephone number for use by Installation residents and employees. Publishing a support phone number will allow interested parties an opportunity to ask questions, obtain information, and report potential polluters.
4. **Measurable goal(s):**
  - Storm Water Support number made available on all pertinent documents and posted in public areas.
5. **Documentation to be submitted with each annual report:**
  - A phone log will be maintained to document and track storm water-related calls. A copy of a phone log and tracking sheet can be found in Appendix E.
6. **Schedule:**
  - Interim milestone dates (if applicable): N/A
  - Implementation date (if applicable): January, 2015
  - Frequency of actions (if applicable): Ongoing
  - Month/Year of each action (if applicable): N/A
7. **Person (position) responsible for overall management and implementation of the BMP:**
  - DPW Environmental Team Member
8. **Rationale for choosing BMP and setting measurable goal(s):**
  - A storm water line will allow for the public to report any issues with the MS4 as well as ask questions about any storm water-related topics.

**Note:** At a minimum, the MS4 must include a BMP in the SWMP for each BMP listed in the NPDES Permit. For those MCMs without specific BMPs listed in the Permit, the MS4 should implement at least 2 BMPs for each MCM. If additional BMPs are chosen, then you should attach an additional sheet for each BMP.

### **Minimum Control Measure #3 - Illicit Discharge Detection and Elimination (IDDE)**

40 CFR Part 122.34(b)(3) Requirement: The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges into your small MS4. You must:

- A) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls
- B) Effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions
- C) Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to your system
- D) Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste

**See Table 4.2.3 (a) of the Permit**

## **A. BMP #1**

### **1. BMP Title:**

- Legal Authority

### **2. Description of BMP:**

- The Clean Water Act and Army Regulation (AR) 200-1 (section 2.2) contains all necessary legal authority. A copy of AR 200-1 can be found in the attached Supporting Documentation disc. In addition to the legal regulations, Fort Gordon maintains the IDDE Plan approved by the Georgia Environmental Protection Division (GA-EPD) in September 2011. A copy of the 2011 IDDE Plan can also be found in the attached Supporting Documentation disc. Fort Gordon has also included in this plan the Illicit Discharge Detection and Elimination Plan Dry Weather Screening Procedures. The Dry Weather Screening Procedures Section includes updated information and is based on the current Storm Water Outfalls and Receiving Streams Map and Inventory.

### **3. Measurable goal(s):**

- The IDDE plan and the IDDE Dry Weather Screening Procedures will be evaluated annually and modified if necessary.

### **4. Documentation to be submitted with each annual report:**

- The approved IDDE plan and Dry Weather Screening Procedures will be submitted in the annual report. The updated IDDE Dry Weather Screening Procedures can be found in Appendix F. If modifications are required the course of the year a copy will be submitted with the annual report.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Ongoing
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Team Member

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- AR 200-1 ensures all Army installations abide by all Federal, State, and Local regulations.

## **B. BMP #2**

1. **BMP Title:**
  - Outfall Map and Inventory
2. **Description of BMP:**
  - Maintain the Installation's existing Geographic Information System (GIS) Storm Sewer System Mapping and Database. The GIS mapping, database, and inventory will continue to be updated as necessary.
3. **Measurable goal(s):**
  - Produce updated map and outfall inventory annually.
4. **Documentation to be submitted with each annual report:**
  - The current Storm Sewer System Map and Outfall Inventory will be provided in each annual report. The current 2013-2014 Storm Sewer System Map and Outfall Inventory are located in Appendix G.
5. **Schedule:**
  - Interim milestone dates (if applicable): N/A
  - Implementation date (if applicable): January, 2015
  - Frequency of actions (if applicable): Annually
  - Month/Year of each action (if applicable): N/A
6. **Person (position) responsible for overall management and implementation of the BMP:**
  - DPW Environmental Team Member and Base GIS Analyst
7. **Rationale for choosing BMP and setting measurable goal(s):**
  - A complete and updated Storm Sewer System Map and Outfall Inventory allows for the necessary personnel to locate and evaluate all parts of the system.

### **C. BMP #3**

**1. BMP Title:**

- IDDE Plan

**2. Description of BMP:**

- The Fort Gordon IDDE Plan was submitted to and approved by the GA-EPD on September 19, 2011. Updated IDDE Dry Weather Screening Procedures have been provided in Appendix F.

**3. Measurable goal(s):**

- 20% of the municipal outfalls will be inspected for IDDE a year. 100% of illicit discharges will be traced and eliminated when encountered.

**4. Documentation to be submitted with each annual report:**

- A copy of the plan and subsequent inspections will be made available with each annual report. The 2011 IDDE plan is available in the attached Supporting Documentation Disc and the Dry Weather Screening Procedures can be found in Appendix F. All inspection forms and documentation of any illicit discharges located and eliminated during the reporting period will be submitted with the annual report.

**5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

**6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Phase II Coordinator

**7. Rationale for choosing BMP and setting measurable goal(s):**

- The IDDE Plan and Dry Weather Screening Procedures outline the necessary actions, roles, and responsibilities for proper illicit discharge detection and elimination.

## **D. BMP #4**

### **1. BMP Title**

- Education

### **2. Description of BMP:**

- Continue on-going management program for food services on the Installation to minimize illicit discharges. Develop and distribute additional IDDE information (e.g., fact sheets, pamphlets, or training materials) for individuals involved with food services on the Installation. Fact sheets about how to properly dispose of kitchen cooking oils, fats, and grease can help inform the residents how to prevent sewer overflows (which often discharge to streams). Pouring fats down kitchen sink drains is a leading cause of sanitary sewer overflows on the installation. Fort Gordon has already developed a Fats, Oils, and Grease Management Plan dated May 2004 and conducts inspections of grease traps and oil/water separators; however, additional education materials and on-going training programs are needed.

### **3. Measurable goal(s):**

- Illicit connection and storm drain awareness is promoted by handing out no less than twenty-five (25) fact sheets/brochures annually to food services personnel that work at the installation.

### **4. Documentation to be submitted with each annual report:**

- The total number and a copy of the information materials distributed during the reporting period will be provided in the annual report. An example of the current fact sheet/brochure can be found in Appendix H.

### **5. Schedule**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Ongoing
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Phase II Coordinator and National Pollutant Discharge and Elimination System (NPDES) Industrial Program Coordinator.

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- The best way to ensure compliance with the IDDE plan is to make sure the persons who utilize the MS4 are informed of the plan requirements.

## **E. BMP #5**

### **1. BMP Title:**

- Complaint Response

### **2. Description of BMP:**

Implement a Storm Water Support phone number for use by installation residents and employees. Publishing a support phone number will allow interested parties an opportunity to ask questions, obtain information, report potential polluters, and lodge complaints. Complaint response procedures will be followed if an official storm water complaint is received. These complaint response procedures include but are not limited to:

- The Storm Water Line is (706) 791-1432 and is manned by DPW Environmental Staff.
- Information regarding the nature of the call, location, time, and date are recorded on a log sheet.
- Complaint is investigated within 24 hours of receipt.
- Detailed report of field investigation along with photos and findings are submitted to the appropriate project manager.
- Origin of the complaint is rectified to maintain compliance with GA-EPD permit.

### **3. Measurable goal(s):**

- Storm Water Support number made available on all pertinent documents and posted in public areas.

### **4. Documentation to be submitted with each annual report:**

- A phone log will be maintained to document and track storm water-related calls. A copy of a phone log and tracking sheet can be found in Appendix E.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Ongoing
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Team Member

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- A storm water line will allow for the public to report any issues with the MS4 as well as ask questions about any storm water-related topics.

**Note:** At a minimum, the MS4 must include a BMP in the SWMP for each BMP listed in the NPDES Permit. If additional BMPs are chosen, then you should attach an additional sheet for each BMP.

#### **Minimum Control Measure #4 - Construction Site Storm Water Runoff Control**

40 CFR Part 122.34(b)(4) Requirement: The permittee must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Storm water discharges from construction activity disturbing less than one acre must be included in the permittee's program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include:

- A) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance
- B) Requirements for construction site operators to implement appropriate erosion and sediment control best management practices
- C) Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality
- D) Procedures for site plan review which incorporate consideration of potential water quality impacts
- E) Procedures for receipt and consideration of information submitted by the public
- F) Procedures for site inspection and enforcement of control measures

**See Table 4.2.4 (a) of the Permit**

## **A. BMP #1**

### **1. BMP Title:**

- Legal Authority

### **2. Description of BMP:**

- The Clean Water Act and Army Regulation (AR) 200-1 contain all necessary legal authority, a copy of AR 200-1 can be found in the Supporting Documentation disc. In addition to the legal regulations, Fort Gordon maintains the Fort Gordon Storm Water Construction Site Permitting Policy which was approved by GA-EPD in February 2012. The policy changed slightly in 2013 with the approved addition of the Operations and Maintenance plan and the expiration and subsequent re-issuance of the NPDES Storm Water Construction Discharge permits. All construction sites will be operated in accordance with the Manual for Erosion and Sediment Control in Georgia.

### **3. Measurable goal(s):**

- Installation staff will evaluate the Storm Water Construction Site Policies and Procedures annually for effectiveness and compliance with all Federal, State, and Local regulations.

### **4. Documentation to be submitted with each annual report:**

- The approved Construction Site Permitting Policy will be submitted in the annual report. The most up to date version of policy can be found in Appendix I. If revisions are made to the policies or procedures during the course of the year a copy of the updated documentation will be submitted with the annual report.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Ongoing
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Team Member

### **Rationale for choosing BMP and setting measurable goal(s):**

- AR 200-1 ensures all Army installations abide by all Federal, State, and Local regulations.

## **B. BMP #2**

### **1. BMP Title:**

- Site Plan Review Procedures

### **2. Description of BMP:**

- In accordance with the Construction Site Permitting Policy DPW Environmental staff will review all Erosion Sedimentation and Pollution Control (ES&PC) plans for NPDES/LDA compliance before submitting the plans to the local issuing authority for permitting. DPW Environmental staff will utilize the GA-EPD ES&PC Plan Review Checklist to accomplish the review. If deficiencies are noted the comments will be sent to the designated point of contact and the plans will be updated and re-submitted to DPW Environmental. Sites which are under one acre and do not require permitting will also be review by DPW Environmental Staff.

### **3. Measurable goal(s):**

- Review all ES&PC plans

### **4. Documentation to be submitted with each annual report:**

- A list of the ES&PC Plans reviewed for the year will be submitted with the annual report.

### **5. Schedule**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Ongoing
- Month/Year of each action (if applicable): Dictated by projects

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Program Coordinator and DPW Environmental Staff

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- It is imperative that DPW Environmental review and approve all ES&PC plans as the Director of DPW will be signing each permit as the Owner and Primary Permittee.

### **C. BMP #3**

**1. BMP Title:**

- Inspection Program

**2. Description of BMP:**

- Daily, weekly, and monthly inspections are required by the NPDES/LDA permits. The operators of each site will perform all required inspections. Fort Gordon Environmental Staff will perform inspections of all active permitted sites including inspections of sites following the installation of initial BMPs, during active constitution, and after final site stabilization. If deficiencies are noted follow-up inspections will be performed by DPW Environmental Staff. If the site is a non-permitted site, less than an acre, DPW Environmental Staff will inspect as needed.

**3. Measurable goal(s):**

- Perform all required inspections

**4. Documentation to be submitted with each annual report**

- A list of active construction sites and the number of associated inspections performed in the year will be submitted in each annual report. Completed inspection forms can be made available upon request. An example of the inspection forms packet Fort Gordon distributes to the contractors can be found in Appendix J.

**5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Ongoing
- Month/Year of each action (if applicable): Project Dependent

**6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Program Coordinator and DPW Environmental Staff

**7. Rationale for choosing BMP and setting measurable goal(s):**

- Active Inspections are the best way to identify deficiencies and ensure compliance.

—

## **D. BMP #4**

### **1. BMP Title:**

- Enforcement Procedures

### **2. Description of BMP:**

- Sites found deficient will be notified and given a prescribed amount of time (usually seven (7) business days) to correct the problems on site. A written violation will be provided on an inspection form with the date of expected completion for the corrective action included. If the site remains out of compliance after the allotted time a Stop Work Order will be issued by DPW Environmental. The Stop Work Order will remain in effect until the site is brought into compliance.

### **3. Measurable goal(s):**

- Enforcement will be taken on 100% of sites discovered to be deficient and fail to correct the problem.

Documentation to be submitted with each annual report:

- Documentation of enforcement actions taken for the reporting period including number, type, and status of the action will be submitted in the annual report.

### **4. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Ongoing
- Month/Year of each action (if applicable): Project Dependent

### **5. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Program Coordinator and DPW Environmental Staff

### **6. Rationale for choosing BMP and setting measurable goal(s):**

- Enforcement actions are necessary to ensure compliance with permits.

## **E. BMP #5**

### **1. BMP Title:**

- Complaint Response

### **2. Description of BMP:**

- A storm water support phone number for use by installation residents and employees. Publishing a support phone number will allow interested parties an opportunity to ask questions, obtain information, and report potential polluters.
- The Storm Water Line is (706) 791-1432 and is manned by DPW Environmental Staff.
- Information regarding the nature of the call, location, time, and date are recorded on a log sheet.
- Complaint is investigated within 24 hours of receipt.
- Detailed report of field investigation along with photos and findings are submitted to the appropriate project manager.
- Origin of the complaint is rectified to maintain compliance with GA-EPD permit.

### **3. Measurable goal(s):**

- 100% of complaints received will be addressed and tracked.

### **4. Documentation to be submitted with each annual report:**

- A phone log will be maintained to document and track storm water-related complaints. Documentation of complaints will contain date, type of complaint, and complaint status. The logs and documents will be submitted with the annual report.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Ongoing
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Team Member

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- A storm water line will allow for the public to report any issues with the MS4 as well as ask questions about any storm water related topics.

## **F. BMP #6**

### **1. BMP Title:**

- Certification

### **2. Description of BMP:**

- In accordance with the NPDES/Land Disturbing Activity (LDA) permits and approved ES&PC plans, each site actively engaged in land disturbing activity must have at least one Georgia Soil and Water Conservation Commission (GSWCC)-certified individual on site at all times of operation. In addition, GSWCC Level II certified DPW staff will review all ES&PC Plans before submission for permitting.

### **3. Measurable goal(s):**

- All certifications must be presented before land disturbing activity commences. DPW Staff will maintain the necessary certification for plan review.

### **4. Documentation to be submitted with each annual report:**

- DPW Staff GSWCC Certification will be submitted with the annual report. A copy of the scanned certification cards of the Fort Gordon Environmental Staff members can be found in Appendix K.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Ongoing
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Phase II Coordinator.

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- GSWCC Certification is required by state and local ordinance.

**Note:** At a minimum, the MS4 must include a BMP in the SWMP for each BMP listed in the NPDES Permit. If additional BMPs are chosen, then you should attach an additional sheet for each BMP.

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**Minimum Control Measure # 5 – Post-Construction Storm Water Management in New Development and Redevelopment**

40 CFR Part 122.34(b)(5) Requirement: The permittee must develop, implement, and enforce a program to address storm water runoff into the MS4 from new development and redevelopment projects, including projects less than one acre if they are part of a larger common plan of development or sale. You must:

- A) Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community
- B) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development or redevelopment projects
- C) Ensure adequate long-term operation and maintenance of BMPs

**See Table 4.2.5 (a) of the Permit**

## **A. BMP #1**

### **1. BMP Title:**

- Legal Authority

### **2. Description of BMP:**

- The Clean Water Act and Army Regulation 200-1 contain all necessary legal authority. In addition to the legal regulations, Fort Gordon maintains the Fort Gordon Water Quality Post-Construction Permitting Requirements which was approved by GA-EPD in June 2012. For all development on the installation the designers are required to implement the latest version of the Georgia Stormwater Management Manual.

### **3. Measurable goal(s):**

- The installation will evaluate the Fort Gordon Water Quality Post-Construction Permitting Requirements document annually to ensure compliance with all regulations.

### **4. Documentation to be submitted with each annual report:**

- A copy of the Fort Gordon Water Quality Post-Construction Permitting Requirements will be provided in the annual report. A copy of the Water Quality Post-Construction Permitting Requirements can be found in Appendix L. If changes are to the documents are necessary during the reporting period, a copy of the updated document will be provided with the annual report.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Ongoing
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Team Member

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- AR 200-1 ensures all Army installations abide by all Federal, State, and Local regulations.

## **B. BMP #2**

### **1. BMP Title:**

- Inventory

### **2. Description of BMP:**

- The Storm Water Operation and Maintenance (O&M) Manual approved by the GA-EPD in October of 2013 contains a full inventory of all storm water control features including but not limited to dry basins, bio-retention basins, and wet weather basins. The inventory will be updated as necessary throughout the year.

### **3. Measurable goal(s):**

- Update the storm water control features inventory in the O&M Manual yearly, adding or deleting features as necessary.

### **4. Documentation to be submitted with each annual report:**

- The most current version of the O&M Manual, including inventories, will be submitted with the annual report. A copy of the Storm Water O&M Manual is located in Appendix M.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Phase II Coordinator and DPW Environmental Staff

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- Maintaining an accurate and up to date inventory is key for storm water control feature operation and effectiveness.

### **C. BMP #3**

- 1. BMP Title:**
  - Inspection Program
- 2. Description of BMP:**
  - The Storm Water O&M Manual approved by the GA-EPD in October of 2013 contains a full inspection program for storm water control features including but not limited to dry basins, bio-retention basins, and wet weather basins. The inventory will be updated as necessary throughout the year
- 3. Measurable goal(s):**
  - 20% of the basins will be inspected yearly in accordance with the permit.
- 4. Documentation to be submitted with each annual report:**
  - All inspections will be submitted with the annual report. Inspections forms are presented in The Storm Water O&M Manual located in Appendix M.
- 5. Schedule:**
  - Interim milestone dates (if applicable): N/A
  - Implementation date (if applicable): January, 2015
  - Frequency of actions (if applicable): Annually
  - Month/Year of each action (if applicable): N/A
- 6. Person (position) responsible for overall management and implementation of the BMP:**
  - MS4 Phase II Coordinator and DPW Environmental Staff
- 7. Rationale for choosing BMP and setting measurable goals(s):**
  - As active inspection program is vital for the proper operation and maintenance of the MS4.

#### **D. BMP #4**

**1. BMP Title:**

- Maintenance Program

**2. Description of BMP:**

- The Storm Water O&M Manual approved by the GA-EPD in October of 2013 contains a full maintenance program for storm water control features including but not limited to dry basins, bio-retention basins, and wet weather basins. The inventory will be updated as necessary throughout the year.

**3. Measurable goal(s):**

- Maintenance will be conducted on structures as needed and/or when identified by inspection or notification by report.

**4. Documentation to be submitted with each annual report:**

- Reports of completed storm water system maintenance and repair actions including a list of structures maintained and the type of maintenance performed will be submitted with the annual report .

**5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

**6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Phase II Coordinator and DPW Environmental Staff

**7. Rationale for choosing BMP and setting measurable goal(s):**

- An active maintenance program ensures deficiencies are properly addressed.

## **E. BMP #5**

### **1. BMP Title:**

- Green Infrastructure (GI)/Low Impact Development (LID) Structures

### **2. Description of BMP:**

- GI/LID structures are required in accordance with the Energy Independence and Security Act and the Fort Gordon Water Quality Post-Construction Permitting Requirements. The Storm Water O&M Manual approved by the GA-EPD in October of 2013 contains a full inventory of storm water control features including but not limited to bioswales, pervious pavement, cisterns, and green roofs dry basins, bio-retention basins, and any other GI/LID structures. The inventory will be updated as necessary throughout the year. Projects will be evaluated for these structures during the Storm water Construction ES&PC Plan review process.

### **3. Measurable goal(s):**

- The addition of any new GI/LID features to the Storm Water System will be tracked through the plan review process and the features will be added to the inventory and map to be submitted with the annual report.

### **4. Documentation to be submitted with each annual report:**

- The current updated Storm Water O&M Manual including all GI/LID features along with a current inventory and map will be submitted with the annual report.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): Project Dependant

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Phase II Coordinator and DPW Environmental Staff

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- Ensuring all projects are evaluated for GI/LID practices and maintaining current GI/LID structures will improve water quality, velocity, and flow in the MS4.

## **F. BMP #6**

### **1. BMP Title:**

- GI/LID Structure Inspection Program

### **2. Description of BMP:**

- The Storm Water O&M Manual approved by the GA-EPD in October of 2013 contains a full inspection program for storm water control features including but not limited to dry basins, bio-retention basins, and GI/LID structures. The inventory will be updated as necessary throughout the year

### **3. Measurable goal(s):**

- 20% of the GI/LID structures will be inspected annually.

### **4. Documentation to be submitted with each annual report:**

- All inspections will be submitted with the annual report. Inspection forms are presented in The Storm Water O&M Manual located in Appendix M. The number of inspections and percentage of total GI/LID structures inspected will be provided in the annual report.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Monthly
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Phase II Coordinator and DPW Environmental Staff

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- As active inspection program is vital for the proper operation and maintenance of the MS4.

## **G. BMP #7**

- 1. BMP Title:**
  - GI/LID Structure Maintenance Program
- 2. Description of BMP:**
  - The Storm Water O&M Manual approved by the GA-EPD in October of 2013 contains a full maintenance program for storm water control features including but not limited to dry basins, bio-retention basins, and GI/LID structures. The inventory will be updated as necessary throughout the year.
- 3. Measurable goal(s):**
  - Maintenance and repairs will be conducted on GI/LID structures as needed.
- 4. Documentation to be submitted with each annual report:**
  - Reports of completed storm water system maintenance and repair actions will be submitted with the annual report. The reports will include the number and type of each GI/LID structure maintained or repaired, as well as the action taken.
- 5. Schedule:**
  - Interim milestone dates (if applicable): N/A
  - Implementation date (if applicable): January, 2015
  - Frequency of actions (if applicable): Annually
  - Month/Year of each action (if applicable): N/A
- 6. Person (position) responsible for overall management and implementation of the BMP:**
  - MS4 Phase II Coordinator and DPW Environmental Staff
- 7. Rationale for choosing BMP and setting measurable goal(s):**
  - An active maintenance program ensures deficiencies are properly addressed.

**Note 1:** At a minimum, the MS4 must include a BMP in the SWMP for each BMP listed in the NPDES Permit. If additional BMPs are chosen, then you should attach an additional sheet for each BMP.

## **Minimum Control Measure #6 - Pollution Prevention/Good Housekeeping for Municipal Operations**

40 CFR Part 122.34(b)(6) Requirement: The permittee must develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Using training materials available from the US Environmental Protection Agency (EPA) and other organizations as guidance, the permittee must, as a part of this program, include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.

**See Table 4.2.6 (a) of the Permit**

## **A. BMP #1**

### **1. BMP Title:**

- MS4 Control Structure Inventory and Map

### **2. Description of BMP:**

- Fort Gordon will maintain the Stormwater System Map and develop the Control Structure Inventory of both items covered in the Storm Water O&M Manual and required items not addressed in the Storm Water O&M Manual.

### **3. Measurable goal(s):**

- Continue to update and maintain the Control Structure Inventory and Map yearly. Ensure all required items are included in the Control Structure Inventory

### **4. Documentation to be submitted with each annual report:**

- The Storm Water Operation and Maintenance Manual will be submitted yearly in the annual report. The O&M Manual is presented in Appendix M. The Stormwater System Map is in Appendix G. The Control Structure Inventory will be compiled from both the Storm Water O& M Manual and the Stormwater System Maps and will be submitted with the 2015 annual report in February of 2016. The installation will provided the number of structures added, changed, and subtracted as necessary as well as the total number of structures in the annual report.

### **5. Schedule:**

- Interim milestone dates (if applicable): February, 2016
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Team Member and Base GIS Analyst.

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- A complete and updated MS4 Control Structure Inventory and Map allows for the necessary personnel to locate and evaluate all parts of the system.

## **B. BMP #2**

### **1. BMP Title:**

- MS4 Inspection Program

### **2. Description of BMP:**

- The Storm Water O&M Manual, which was accepted by the GA-EPD in September 2013, contain a full MS4 inspection program.

### **3. Measurable goal(s):**

- 20% of the system will be inspected annually.

### **4. Documentation to be submitted with each annual report:**

- All inspections will be provided in the annual report. The installation will provide the number and percentage of structures inspected during the reporting period. Inspections forms are presented in The Storm Water O&M Manual located in Appendix M

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Monthly
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Staff

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- Inspection of the system will allow for base personnel to identify and address deficiencies.

### **C. BMP #3**

**1. BMP Title:**

- MS4 Maintenance Program

**2. Description of BMP:**

- The Storm Water O&M Manual which was accepted by the GA-EPD in September 2013 contains a full MS4 maintenance program.

**3. Measurable goal(s):**

- Deficiencies identified by the inspection process will be addressed.

**4. Documentation to be submitted with each annual report:**

- A list of MS4 maintenance operations will be provided in the annual report. The installation will provide the number of each type of structure maintained during the reporting period.

**5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

**6. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Staff

**7. Rationale for choosing BMP and setting measurable goal(s):**

- Proper maintenance of the MS4 will extend the life of the system, ensure better water quality, and reduce repair costs.

## **D. BMP #4**

### **1. BMP Title:**

- Street and Parking Lot Cleaning

### **2. Description of BMP:**

- Fort Gordon has procedures for an efficient and cost-effective method for the removal of litter from streets and parking lots located in the MS4 urbanized area. The base operations contractor performs this service. The streets sweeping activities are prioritized by heaviest traffic to lowest traffic usage for cleaning. Special events like bike races, road races, and festivals are given extra priority. The route for regular quarterly cleaning follows the main thoroughfares from the two main gates on Chamberlain and Avenue of the States, through the Main Signal Campus, DDEAMC, the Commissary/PX area, and the residential areas. The refuse is collected in roll-off dumpsters and disposed of off base in an approved landfill. Technical Exhibit 6-VII-5 in Appendix O is an example of the quarterly Street Sweeping Schedule including location and mileage swept in quarter.

### **3. Measurable goal(s):**

- Approximately 100 to 120 miles of streets will be swept quarterly.

### **4. Documentation to be submitted with each annual report:**

- The total amount of debris collected and miles of streets swept quarterly during street sweeping operations will be submitted with the annual report.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Phase II Coordinator and Base Operations (Base Ops) Staff

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- The street sweeping program will directly remove debris and potential contamination from the MS4.

## **E. BMP #5**

### **1. BMP Title:**

- Employee Training

### **2. Description of BMP:**

- Environmental Officer Training is performed yearly by the DPW Environmental Program Managers. The target audience is the tenants, base operations contractors, and units on the base. A number of environmental topics are discussed including but not limited to storm water industrial requirements and policies, storm water Construction Permitting, and Hazardous Waste handling and disposal.

### **3. Measurable goal(s):**

- The installation will hold at least one training class annually discussing storm water and MS4 related issues.

### **4. Documentation to be submitted with each annual report:**

- Training courses, pictures, and sign in sheets will be provided in the annual report. Two Storm Water training presentations can be found in Appendix N.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Staff

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- Direct contact and an opportunity to engage face to face with the Environmental Offices is a vital part of ensuring compliance.

## **F. BMP #6**

### **1. BMP Title:**

- Waste Disposal

### **2. Description of BMP:**

- The Storm Water O&M Manual which was accepted by the GA-EPD in September 2013 contains a full MS4 Maintenance program including removal and disposal of excess vegetation from storm water control features and excess sediment collection in the MS4. Waste material is separated and classified on site for disposal. Depending on what type of waste it is the material is trucked to a number of facilities both on and off base. The vegetation and wood waste is ground and utilized as mulch or disposed of at one of four on base wood waste or inert landfills. The excess silt and soil is trucked to one of three active on base surface mine landfills. The household waste or other waste, if encountered, is collected in a dumpster at a central location and hauled by a contractor to an off base landfill.

### **3. Measurable goal(s):**

- Follow MS4 Maintenance program and clear/dispose of 100% of vegetation/sediment and other waste from storm water control features as needed. Dispose of waste in approved facilities depending on type of waste collected.

### **4. Documentation to be submitted with each annual report:**

- A report of each storm water feature which was cleared of excess vegetation or sediment and the disposal of the excess material will be submitted with the annual report. The report will include the measured amount of material removed.

### **5. Schedule**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- DPW Environmental Staff and Base Ops Contractor Staff.

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- Proper clean out and disposal of waste from the storm water control features will ensure MS4 operation.

## **G. BMP #7**

### **1. BMP Title:**

- New Flood Management Projects

### **2. Description of BMP:**

- New projects will be evaluated for flood management opportunities during the Construction Storm Water ES&PC Plan review process. The Georgia Stormwater Management Manual is used to review plans to ensure new projects incorporate water quality performance standards.

### **3. Measurable goal(s):**

- Evaluate 100% of new projects for flood management opportunities

### **4. Documentation to be submitted with each annual report:**

- A list of projects evaluated will be provided with the annual report.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Dictated by Projects
- Month/Year of each action (if applicable): Dictated by Projects

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Program Coordinator and DPW Environmental Staff.

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- New Flood Management projects will help to elevate some previously flood prone areas of the MS4 and associated drainage basins.

## **H. BMP #8**

### **1. BMP Title:**

- Existing Flood Management Projects

### **2. Description of BMP:**

- DPW Environmental staff will evaluate existing basins to ensure they meet the requirements of the Georgia Water Quality Manual (Blue Book) in deference to flood management and proximity to 303d listed streams. Basin retrofits or re-designs will be on a case-by-case basis and will be dependent on the designer.

### **3. Measurable goal(s):**

- Evaluate four existing basins for compliance with Blue Book annually.

### **4. Documentation to be submitted with each annual report :**

- An evaluation of each basin will accompany the annual O&M inspection report in the overall annual report. The installation will provide an evaluation report and a summary of any retrofit activity if it occurs during the reporting period.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Program Coordinator and DPW Environmental Staff.

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- Basins which may require a retrofit or alteration project to become compliant with Georgia Blue Book standards can be identified and addressed.

## **I. BMP #9**

### **1. BMP Title:**

- Municipal-Type Facilities

### **2. Description of BMP:**

- DPW Environmental Staff will evaluate and prepare an inventory and inspection program for all Municipal-Type Facilities which are not covered under the Storm Water Industrial Program and/or any other Clean Water Act permit. DPW staff and Base Ops contactors will inspect these facilities, looking for any possible source of stormwater contamination.

### **3. Measurable goal(s):**

- Evaluate and prepare inventory and inspection program for all municipal-type facilities. 20% of the Municipal-Type Facilities will be inspected annually.

### **4. Documentation to be submitted with each annual report:**

- The updated inventory and inspections will be submitted with the annual report. Inspection forms are in development.

### **5. Schedule:**

- Interim milestone dates (if applicable): N/A
- Implementation date (if applicable): January, 2015
- Frequency of actions (if applicable): Annually
- Month/Year of each action (if applicable): N/A

### **6. Person (position) responsible for overall management and implementation of the BMP:**

- MS4 Program Coordinator and DPW Environmental Staff.

### **7. Rationale for choosing BMP and setting measurable goal(s):**

- Inclusion of any Municipal-Type activity not covered by any other permit will ensure the MS4 addresses all possible sources of contamination.

**Note:** At a minimum, the MS4 must include a BMP in the SWMP for each BMP listed in the NPDES Permit. If additional BMPs are chosen, then you should attach an additional sheet for each BMP.

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