

Town of Abita Springs, La.

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A RESOLUTION OF THE BOARD OF ALDERMAN OF THE TOWN OF ABITA SPRINGS ADOPTING AN MS4 PLAN FOR THE CONTROL OF STORM WATER RUNOFF FROM THE TOWN AND TO PROVIDE FOR RELATED MATTERS

WHEREAS, the Town of Abita Springs has reviewed requirements for the Louisiana Pollution Discharge Elimination System (LPDES) MS4 permit, and

WHEREAS, the LPDES requires the Town of Abita Springs prepare a Small Municipal Separate Storm Sewer System (MS4) storm sewer management plan outlining minimum control standards for storm water management, and

WHEREAS, in compliance with State of Louisiana requirements the Town of Abita Springs has prepared a MS4 plan,

NOW THEREFORE BE IT RESOLVED, that the Town of Abita Springs Board of Alderman does hereby acknowledge and adopt the MS4 plan.

AND BE IT FURTHER RESOLVED, that the Board of Alderman authorizes the Mayor to take any actions he deems necessary to implement and execute the plan.

This resolution adopted on motion of Alderman Patterson, seconded by Alderman Edmiston, on the 15th, day of October, 2013.

Vote was:

YEAS: 5 Aldermen Berrigan, Edmiston, Kilpatrick, Patterson, and Welliver

NAYS: 0

ABSENT: 0

ABSTAIN: 0

GREG LEMONS, MAYOR

ATTEST
KATHY ARMAND, TOWN CLERK



TOWN OF ABITA SPRINGS MS4 PLAN

BACKGROUND INFORMATION

The Town of Abita Springs (Town) is covered under the LPDES Small Municipal Separate Storm Sewer System (MS4) Permit. The MS4 area designated by the permit is covers the entire Town.

The permit authorizes discharges of storm water from a regulated MS4 as defined in LAC 33:IX.2511.B.16 & LAC 33:IX.2519. The MS4 area designated by the permit is the full boundary of the Town.

The Town initially submitted a Notice of Intent (NOI) to the Department on October 2, 2003. The first MS4 permit was issued to the Town on 10/30/2003. The permit was automatically reauthorized on November 30, 2007. On February 19, 2013, the Town was notified to reapply for coverage under the reissued permit. An NOI was submitted to the Department on March 13, 2013. On June 20, 2013, the NOI was deemed administratively complete. Public Notice of the Draft Permit was on June 28, 2013.

The permit requires operators who are permitted to have a fully developed and implemented storm water management plan.

The storm water management plan (SWMP) is designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Louisiana Environmental Quality Act and the Clean Water Act.

The Storm Water Management Program shall cover the term of the permit and shall be updated as necessary, or as required by the Secretary or designee, to ensure compliance with the statutory requirements of LAC 33:IX.2523 and Section 402(p)(3)(B) of the Act. Modifications to the Storm Water Management Program shall be made in accordance with Parts IV.E and VI.W. Compliance with the Storm Water Management Program and any schedules required by the permits shall be deemed compliant with Parts IV.A and IV.D.

The storm water management program must include the minimum control measures (MCMs) described below:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Developments and Redevelopments
6. Pollution Prevention/Good Housekeeping for Municipal Operations

MS4 PLAN FOR THE TOWN OF ABITA SPRINGS

THE TOWN OF ABITA SPRINGS HAS RECEIVED THE RENEWAL OF ITS NOTICE OF AUTHORIZATION TO DISCHARGE UNDER THE REISSUED LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM (LPDES) GENERAL PERMIT FOR DISCHARGE FROM SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (LAR040000), DATED AUGUST 21, 2013

THE TOWN OF ABITA SPRINGS AUTHORIZATION NUMBER IS: LAR041036
AGENCY INTEREST NUMBER 109095

IN ORDER TO RETAIN THIS PERMIT THE TOWN OF ABITA SPRINGS MUST PARTICIPATE IN THE LOUISIANA ENVIRONMENTAL PROTECTION AGENCIES' STORMWATER RUNNOFF MS4 POLLUTION PREVENTION PROGRAM.

This document describes each MCM and the Best Management Practices (BMPs) that have been implemented to maintain compliance with the LPDES MS4 permit. This plan will be updated as needed to address the latest information to maintain compliance with the MS4 permit.

Allowable Non-storm water discharges are defined in the MS4 General Permit Part C and include:

- Discharges or flows from fire fighting activities (excludes predictable and controllable discharges from a fire fighting training facility);
- Fire hydrant flushings;
- Potable water including: water line flushings using potable water; drinking fountain overflows; lawn watering runoff; and similar sources of potable water;
- Uncontaminated air conditioning or compressor condensate;
- Residual street wash water and pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed);
- Routine external building wash down which does not use detergents;
- Drainage from landscaping watering;
- Rising ground waters;
- Uncontaminated ground water infiltration (as defined in 40 CFR 35.2005(20));
- Uncontaminated pumped ground water;

- Fountain drains;
- Irrigation water;
- Uncontaminated spring water;
- Water from crawl space pumps;
- Footing drains;
- Water from individual car washing;
- Flows from riparian habitats and wetlands;
- Dechlorinated swimming pool discharges;
- Other similar occasional incidental discharges (e.g. non-commercial or charity car washes) where such discharges will not cause a problem either due to the nature of the discharge or controls in the MS4 places on the discharge. The permittee must identify all types of discharges that they will allow as occasional incidental discharges and specify those discharges in their SWMP.

Discharge Compliance with Water Quality Standards

The Town of Abita Springs must ensure that storm water discharges to water bodies designated as Outstanding Natural Resource Waters (ONRWs) will not degrade water quality to the Maximum Extent Practicable (MEP). Additional BMPs and regulatory mechanisms (i.e. ordinances or codes) may be required in order to prevent erosion, sedimentation, or illicit discharges to ONRWs. The Town's MS4 discharges into an ONRW.

Total Maximum Daily Load (TMDL) Allocations

The Town's storm water runoff from the MS4 flows into a basin subsegment that is listed on the most recent EPA approved 303 (d) list. The Abita River does not have a TMDL and is listed as Category 5 in Appendix A of LDEQ's most recent Integrated Report (IR). The basin subsegment is not fully supported for Mercury in fish tissue. The suspect cause is due to atmospheric deposition.

Pollutants of Concern:

- Silt/Sediment
- Oil & Grease
- Pet Waste
- Floatables

Target Audience:

- Residential
- Businesses
- Contractors/Developers
- General Public

PUBLIC EDUCATION

1. Minimum Control Measure 1: Public Education and Outreach on Storm Water Impacts

1.1 Regulatory Requirement

a. You must:

- (1)** Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps the public can take to reduce pollutants in storm water runoff.
- (2)** Identify each individual BMP and its corresponding measurable goal that you use in your public education and outreach program that is designed to minimize the discharge of pollutants into your MS4.
- (3)** Describe how you inform individuals and households about the steps they can take to reduce storm water pollution.
- (4)** Describe how you inform individuals and groups on how to become involved in the storm water program (with activities such as local stream and beach restoration activities).
- (5)** Identify the target audiences for your education program who are likely to have significant storm water impacts (including commercial, industrial and institutional entities) and why those targeted audiences were selected.
- (6)** Identify the target pollutant sources your public education program is designed to address.
- (7)** Identify your outreach strategy, including the mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) you use to reach your targeted audiences, and how many people you expect to reach by your outreach strategy over the permit term.
- (8)** Identify who is responsible for overall management and implementation of your storm water public education and outreach program and, if different, who is responsible for each of the BMPs identified for your storm water public education and outreach program.
- (9)** Describe how you evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

The table below depicts the BMPs that the Town performs or plans to perform for MCM 1, the responsible party and any applicable deadlines.

MCM 1 – Public Education AND OUTREACH BMPs		RESPONSIBLE PARTY	TIMELINE
1.	Distribute storm water educational information on the backs of utility bills which are sent to all residents of the town. <i>Measurable Goal: Educate citizens through on direct mailing.</i>	PLANNING & ZONING DEPT. IN CONJUNCTION WITH THE UTILITY DEPT.	Quarterly
2.	Signage regarding storm water drains to an <i>Outstanding Natural Resource Water</i> placed at the trailhead. <i>Measurable Goal: Educate the public on the need to protect the MS4's receiving stream's designation as an ONRW.</i>	PUBLIC WORKS DEPT.	By 12/31/2013
3.	Place "Clean up after your pet" signs at dog park. <i>Measurable Goal: To post signs and dog waste bag distribution stations</i>	PUBLIC WORKS DEPT	When Dog Park is created.
4.	Create and Distribute Town Newsletters with the MS4 Information. <i>Measurable Goal: To distribute newsletters at a minimum biannually.</i>	PLANNING & ZONING DEPT.	Biannually
5.	Post Storm Water Information on the Town's Website. <i>Measurable Goal: Educate the public through the use of the Town website</i>	MAYOR'S OFFICE	As needed
6.	Implement a Storm Water Education Program for School Children. <i>Measurable Goal: A minimum of 25% of all school children (K-12) will be educated every two years on storm water pollution by providing the schools within the jurisdiction of the Town with materials including brochures and live presentations.</i>	PLANNING & ZONING DEPT. AND THE MAYOR'S OFFICE	Every two years
7.	Provide information regarding the <i>Potential</i> Mercury Risk associated with eating fish. <i>Measurable goal: Reach as many citizens as possible through the Town's website and newsletters.</i>	PLANNING & ZONING DEPT. , UTILITY DEPT. & MAYOR'S OFFICE	December 2014

PUBLIC INVOLVEMENT

2. Minimum Control Measure 2: Public Involvement/Participation

2.1 Regulatory Requirement

a. You must:

- (1) At a minimum, comply with state and local public notice requirements when implementing a public involvement/participation program.
- (2) Identify each individual BMP and its corresponding measurable goal that you use in public involvement/participation program.
- (3) Describe how you involve the public in the development and submittal of your NOI and storm water management program. (You are strongly encouraged to make the storm water management plan and Annual reports available for review/comment at the local level prior to submittal to LDEQ.)
- (4) Describe how you actively involve the public in the development of your storm water program. (You are strongly encouraged to make updates to the storm water management plan and Annual Reports available for review/comment at the local level prior to submittal to LDEQ.)
- (5) Identify the target audience for your public involvement program. You are encouraged to actively involve all potentially affected stakeholder groups, including commercial and industrial businesses, trade associations, environmental groups, homeowners associations, and educational organizations, among others.
- (6) Identify and describe the types of public involvement activities included in your program. Where appropriate, consider the following types of public activities:
 - 1) Citizen representatives on a storm water management panel;
 - 2) Public hearings;
 - 3) Working with citizen volunteers willing to educate others about the program; and
 - 4) Volunteer monitoring of stream/river clean-up activities.
- (7) Identify who is responsible for the overall management and implementation of your storm water public involvement/participation program and, if different, who is responsible for each of the BMPs identified for this program.
- (8) Describe how you evaluate the success of this minimum control measure, including how you selected the measurable goals for each of the BMPs.

The table below depicts the BMPs that the Town currently performs or plans to perform for MCM 2, the responsible parties and any deadlines.

MCM 2 – Public INVOLVEMENT AND PARTICIPATION BMPs		RESPONSIBLE PARTY	TIMELINE
1.	Develop cleanup and beautification projects that will become an annual event. <i>Measurable Goal: Engage citizens in removing debris from yards and drainage ditches so it is not carried out into the storm drainage system or waterways.</i>	MAYOR’S OFFICE PLANNING & ZONING DEPT.	Annually
2.	If possible, the Town will participate in a Household Hazardous Waste Collection Day facilitated in conjunction with St. Tammany Parish’s collection date. <i>Measurable Goal: Collect household hazardous waste so it is not released into the storm drain system or waterways.</i>	WILL DIRECT RESIDENTS TO ST TAMMANY PARISH’S PICK UP SITES.	Annually
3.	Participate in a River/Stream Cleanup Day once per year. Outreach this effort through the town’s website and brochures. <i>Measurable Goal: Obtain volunteers for the event. Remove and dispose of floatable debris.</i>	MAYOR’S OFFICE	Annually
4.	Host at least one community meeting per year to discuss town-wide storm water issues. <i>Measurable Goal: Solicit input from the community on local storm water issues.</i>	PLANNING & ZONING DEPT. AND MAYOR’S OFFICE	Annually

ILLCIT DISCHARGE

3. Minimum Control Measure 3: Illicit Discharge Detection and Elimination

3.1 Regulatory Requirement

a. You must:

- (1) Develop, implement, and enforce a program to detect and eliminate illicit discharges (as defined at LAC 33:IX.2511.B2) into your small MS4.
- (2) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and locations of all water of the U.S. that receive discharges from those outfalls.
- (3) To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions.
- (4) Develop, if not already completed, and implement a plan to detect and address non-storm water discharges including illegal dumping to your system.
- (5) Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- (6) Address the following categories of non-storm water discharges or flows only if you identify them as significant contributors of pollutants to your small MS4: water line flushing, landscape irrigation, rising ground water, uncontaminated ground water infiltration (as defined in 40 CFR 35.2005(20)), uncontaminated pumped ground water, incidental discharges of potable water (e.g. drinking fountain overflows), foundation drains, air conditioning condensate, irrigation water, springs water, water from crawl space pumps, footing drains, lawn watering runoff, water from individual residential car washing, flows from riparian habitats and wetlands, de-chlorinated swimming pool discharges, residual street wash water, and discharges or flows from fire fighting activities (excludes predictable and controllable discharges from fire fighting training facility), where such discharges will not cause a problem with either due to the nature of the discharge or controls the MS4 places on the discharge. Significant contributors of pollutants from the above sources may require additional controls, such as enhanced public education, ordinances, or other regulatory mechanisms (to be implemented by the operator).
- (7) Develop a list of other similar occasional incidental non-storm water discharges (e.g. non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges. These are non-storm water discharges

must not be reasonably expected (based on information available to the permittees) to be significant sources of pollutants to the Municipal Separate Storm Sewer, because of either the nature of the discharges or conditions you have established for allowing these discharges to your MS4 (e.g. a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs on the wash water, etc.). You must document in your SWMP any local controls or conditions placed on the discharges. You must provide a provision prohibiting any individual non-storm water discharge that is determined to be contributing significant amounts of pollutants to your MS4.

- b. You must identify each individual BMP and its corresponding measurable goal that you use in your illicit discharge detection and elimination program that is designed to minimize the discharge of pollutants into your MS4. You must include, at a minimum, the following information:
 - (1) Describe the sources of information you used for the maps, and how you plan to verify the outfall locations with field surveys. Permittees that are required to have completed their storm sewer maps must describe how they developed this map and how the map will be regularly updated.
 - (2) Describe the mechanism (ordinance or other regulatory mechanism) you use to effectively prohibit illicit discharges into the MS4 and why you chose that mechanism. If you need to develop this mechanism, describe your plan and a schedule to do so in accordance with Part I.V.C. Permittees that are required to have already developed an ordinance or other regulatory mechanism must include a copy of the relevant section(s) with your SWMP.
 - (3) Describe how you ensure that your illicit discharge ordinance (or other regulatory mechanism) is implemented through appropriate enforcement procedures and actions.
 - (4) Describe your plan to detect and address illicit discharges to your system, including discharges from illegal dumping and spills. Your plan must include dry weather field screening for non-storm water flows and field tests of selected parameters as indicators of discharge sources. Your plan must also address on-site sewage disposal systems that flow into your storm drainage system. Your description must address, at a minimum, the following:
 - i. Procedures for locating priority areas, which includes areas with higher likelihood of illicit connections (e.g. areas with older sanitary sewer lines, for example), or ambient sampling to locate impacted reaches.
 - ii. Procedures for tracing the source of an illicit discharge, including the specific techniques you will use to detect the location of the source.

- iii. Procedures for removing the source of the illicit discharge.
 - iv. Procedures for program evaluation and assessment.
- (5) Describe how you inform the public employees, businesses, and the public of hazards associated with illegal discharges and improper disposal of waste. Include in your description how this plan will be coordinated with your public education minimum measure and your pollution prevention/good housekeeping minimum measure programs.
 - (6) Identify who is responsible for overall management and implementation of your storm water illicit discharge detection and elimination program and, if different, who is responsible for each of the BMPs identified for this program.
 - (7) Describe how you evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

The table below depicts the BMPs that the Town currently performs or plans to perform for MCM 3, the responsible parties and any deadlines.

MCM 3 –ILLICIT DISCHARGE DETECTION & ELIMINATION BMPs		RESPONSIBLE PARTY	TIMELINE
1.	Develop a storm drainage system map. <i>Measurable Goal: A storm drainage system map will be developed.</i>	PUBLIC WORKS DEPT. P&Z DEPT.	July 31, 2014
2.	Identify illicit connections through dry weather screening and targeted video inspection. <i>Measurable Goal: A survey during dry weather of 50% of the storm drainage systems per year will be conducted to identify non-storm water flows. Once each year's survey is complete, areas with suspicious discharges will be inspected with video camera to detect suspected direct connections to the wastewater system and identify areas where wastewater might be leaking into adjacent storm drainage systems.</i>	PUBLIC WORKS DEPT. AND TOWN MONITORS	Annually
3.	Develop and implement an illicit discharge/illegal dumping hotline through telephone calls and/or email. <i>A hotline will supplement the Town's effort to target outfalls for further inspection and will facilitate the cleanup and remediation of dumping sites. Also, advertising the public about the hazards of illicit discharges and illegal dumping</i>	PLANNING & ZONING DEPT. MAYOR'S OFFICE	July 31, 2014
4.	Train all Town personnel regarding illicit discharge detection and elimination (IDDE) provisions, including how to identify an illegal discharge and how to undertake the recommended follow-up actions. Update training as necessary. <i>Measurable Goal: All Town staff trained by December 2014.</i>	PLANNING & ZONING DEPT.	December 1, 2014

CONSTRUCTION SITE CONTROLS

4. Minimum Control Measure 4: Construction Site Storm Water Runoff Control

4.1 *Regulatory Requirement*

a. You must:

- (1) Develop, implement and enforce a program to reduce pollutants in any storm water runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The extent to which the program will rely upon the LPDES Phase II Construction regulation should be specified.
- (2) Your program must include:
 - (a) an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law.
 - (b) requirements for construction site operators to implement appropriate erosion and sediment best control management practice;
 - (c) requirements for construction site operators to control waste such as, but not limited to, discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at construction sites that may cause adverse impacts to water quality;
 - (d) procedures for site plan review which incorporate consideration of potential water quality impacts; at the construction site;
 - (e) procedures for site plan review which incorporate consideration of potential water quality impacts;
 - (f) procedures for receipt and consideration of information submitted by the public; and
 - (g) procedures for site inspection and enforcement of control measures.
- (3) You must identify each individual BMP and its corresponding measurable goal that you use in your program that is designed to minimize the discharge of pollutants into your MS4. You must include, at a minimum, the following information:

- (a) The mechanism (ordinance or other regulatory mechanism) you use to require erosion and sediment controls at construction site and why you chose that mechanism. If you need to develop this mechanism, describe your plan and a schedule to do so in accordance with Part IV.V. Permittees that are required to have already developed an ordinance or other regulatory mechanism must include a copy of the relevant sections(s) with your SWMP.
- (b) Your mechanisms to ensure compliance with your erosion and sediment control mechanisms, including the sanctions and enforcement actions. Describe your procedures for determining which sanctions will apply to which infractions (such as your enforcement escalation process). Possible sanctions include non-monetary penalties (such as stop work orders and/or permit denials for non-compliance), as well as monetary penalties such as fines and bonding requirements.
- (c) Your requirements for construction site operators to implement appropriate erosion and sediment control BMPs and to control waste at construction sites that may cause adverse impacts to water quality. Examples of such waste might include discarded building materials, concrete truck washout, chemicals, litter and sanitary waste.
- (d) Your procedures for site plan review, including the review of preconstruction site plans, which incorporate consideration of potential water quality impacts. Describe your procedures and the rationale for how you will identify certain sites for site plan review, if your site plan review does not include the review of all pre-construction site plans.
- (e) Your procedures for receipt and consideration of information submitted by the public. Consider coordinating this requirement with your public education program.
- (f) Your procedures for site inspection and enforcement of control measures, including how you will prioritize sites for inspection. Include procedures for site inspections and enforcement of control measures including steps to identify priority sites for inspection and enforcement based on the nature of the construction activity, topography, and the characteristics of soils and receiving water quality.
- (g) Who is responsible for overall management and implementation of your construction site storm water program and, if different, who is responsible for each of the BMPs identified for this program.
- (h) Describe how you evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

The table below depicts the BMPs that the Town currently performs or plans to perform for MCM 4, the responsible parties and any deadlines.

MCM – 4 Construction Site Storm Water Runoff Control BMPs		Responsible Party	Timeline
1.	Develop a public education plan to inform the public and construction site operators of the requirements for construction site storm water controls. <i>Measurable Goal: The Town will develop or acquire public education materials in Year 1 of the permit period. The materials will be distributed to construction site operators in Year 2 of the permit period.</i>	PLANNING & ZONING DEPT.	
2.	Require the use of appropriate perimeter controls on construction sites. <i>Measurable Goal: Erosion and sediment controls require proper installation and maintenance of all perimeter controls.</i>	PLANNING & ZONING DEPT.	CURRENTLY IN PLACE
3.	Drainage Plans for New Developments must be approved by the Town Engineer <i>Measurable Goal: The Town engineer will have procedures for site plan review that considers potential water quality impacts.</i>	PLANNING & ZONING DEPT, TOWN ENGINEER & PUBLIC WORKS DEPT	CURRENTLY IN PLACE
4.	The Town Inspectors will obtain training in erosion and sediment controls. <i>Measurable Goal: All Town inspectors will be trained on erosion and sediment controls by December 2014.</i>	PLANNING & ZONING DEPT. TOWN MONITORS	BY 12/2014
5.	<i>Develop a Construction Site Inventory. Measurable Goal: A tracking system will be developed to inventory projects and identify sites for inspection.</i>	PLANNING & ZONING DEPT, TOWN ENGINEER	12/2014
6.	The Town will issue Notices of Violations and Stop Work Orders to any construction site that does not follow proper storm water runoff management procedures. <i>Measurable Goal: Stop all work that is not in compliance with LDEQ and Town mandates.</i>	TOWN INSPECTOR TOWN MARSHAL	CURRENTLY IN PLACE

POST CONSTRUCTION CONTROLS

5. Minimum Control Measure 5: Post-Construction Storm Water Management in New Development/Redevelopment

5.1 Regulatory Requirement

a. You must:

- (1) Develop, implement and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your small MS4. Your program must ensure that controls are in place that would prevent or minimize water quality impacts.
- (2) Develop and implement strategies which include a combination of structural and/or non-structural best management practices (BMPs) appropriate for your community.
- (3) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law; and
- (4) Ensure adequate long-term operation and maintenance of BMPs.
 - 5) You must identify each individual BMP and its corresponding measurable goal that you use in your post-construction storm water management program that is designed to minimize the discharge of pollutants into your MS4. You must include, at a minimum, the following information:
 - (1) A description of your program to address storm water runoff from new development and redevelopment projects. Include in your description any specific priority areas for this program.
 - (2) A description of how your program is specifically tailored for your local community, how it will minimize water quality impacts, and how it is designed to attempt to main pre-development runoff conditions.
 - (3) A description of any non-structural BMPs in your program, which may include, but is not limited to:
 - i. Policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation.
 - ii. Policies or ordinances that encourage infill development in higher density urban areas, and areas with existing storm water infrastructure.

- iii. Education programs for developers and the public about project designs that minimize water quality impacts; and
 - iv. Other measures such as minimization of the percentage of impervious area after development, use of measures often thought of as good housekeeping, preventative maintenance and spill prevention.
- (4) Any structural BMPs in your program, which may include, but is not limited to:
- i. Storage practices such as wet ponds and extended-detention outlet structures;
 - ii. Infiltration practices such as infiltration basins and infiltration trenches.
- (5) Describe the mechanism (ordinance or other regulatory Mechanism) you use to address post-construction runoff from new development and why did you choose that mechanism. If you need to develop a mechanism, describe your plan and a schedule to do so in accordance with Part IV.D. If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with your program.
- (6) Describe how you ensure the long-term operation and maintenance (O & M) of your selected BMP. Options to help ensure that future O & M responsibilities are clearly identified include an agreement between you and another party such as the post-development landowners or regional authority.
- (7) Describe who is responsible for overall management and implementation of your post-construction management program and, if different, who is responsible for each of the BMPs identified for that control measure.
- (8) Describe how you evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

The table below depicts the BMPs that the Town currently performs or plans to perform for MCM 5, the responsible parties and any deadlines.

MCM – 5 Post-Construction Storm Water Management in New Development and Re-Development BMPs		Responsible Party	Timeline
1.	<p>Develop a Post-Construction Plan for the Town that includes protocols for the inventory, inspection and maintenance of the Post-Construction storm water activities.</p> <p><i>Measurable Goal: Ensure all development projects follow the appropriate SWPPP guidelines.</i></p>	<p>PLANNING & ZONING DEPT. TOWN ENGINEER</p>	DECEMBER 2014
2.	<p>Inform the owner of any unmaintained post-construction storm water practices and if necessary, issue warning/citations to ensure that all post-construction management practices are properly maintained.</p> <p><i>Measurable Goal: All post-construction management practices are maintained and remain working to the best ability.</i></p>	<p>PLANNING & ZONING DEPT. TOWN MARSHAL</p>	DECEMBER 2014
3.	<p>Develop a program for the maintenance of structural storm water controls.</p> <p><i>Measurable Goal: Conduct an inventory of structural runoff controls by July 1, 2014. Develop a map to integrate the location of these controls by July 1, 2015 with schedules for regular inspection and maintenance. Conduct two inspections of each structural control per year and maintenance as needed.</i></p>	<p>PUBLIC WORKS DEPT. PLANNING & ZONING DEPT,</p>	DECEMBER 2014
4.	<p>Maintain an updated inventory of all post-construction storm water management practices.</p> <p><i>Measurable Goal: Stay informed of all post-construction/redevelopment storm water management practices.</i></p>	<p>PLANNING & ZONING DEPT. PUBLIC WORKS DEPT.</p>	DECEMBER 2014
5.	<p>Maintain a list of all post-construction management practices that the Town has contracted to manage.</p> <p><i>Measurable Goal: insure that all management practices are maintained.</i></p>	<p>PUBLIC WORKS DEPT.</p>	DECEMBER 2014

POLLUTION CONTROL

6. Minimum Control Measure 6: Pollution Prevention/Good Housekeeping for Municipal Operations

6.1 Regulatory Requirement

a. You must:

- (1) Develop, implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing a pollutant runoff from municipal operations.
- (2) Using training materials that are available from EPA, LDEQ or other organizations, your program must include employee training to prevent and/or reduce storm water pollution runoff from activities such as park and open space maintenance, fleet and building maintenance, new construction and land
- (3) Describe how your operation and maintenance program is designed to prevent or reduce pollutant runoff from your municipal operations. Your program must specifically list the municipal operations that are impacted by this operation and maintenance program.
- (4) Include a list of industrial facilities you own or operate that are subject to the LPDES Multi-Sector General Permit (MSGP) or individual LPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to your MS4. Include the LPDES permit number or a copy of the industrial NOI for each facility.
- (5) Describe any government employee training program you will use 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

The table below depicts the BMPs that the Town currently performs or plans to perform for MCM 6, the responsible parties and any deadlines.

MCM – 6 Pollution Prevention/Good Housekeeping for Municipal Operations		Responsible Party	Timeline
1.	<p>Develop inspection and maintenance schedules for reducing pollutant runoff from municipal operations.</p> <p><i>Measurable Goal: To reduce the threat of polluting storm water.</i></p>	PUBLIC WORKS DEPT.	By July 2014
2.	<p>Provide employee training on how to incorporate pollution prevention; good housekeeping techniques into municipal operations, such as parks and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. The training will be prioritized first for management and supervisory staff, then to equipment operators and laborers.</p> <p><i>Measurable Goal: The Town will use training materials that are available from EPA or relevant organizations. Training goal is to train 25% of applicable Town staff per year. Update training as needed.</i></p>	PLANNING & ZONING DEPT MAYOR'S OFFICE	By July 2014
3.	<p>Roadside leaf/ lawn debris collection will be scheduled and performed to decrease leaf/ lawn debris buildup in storm water conveyances.</p> <p><i>Measurable Goal: Engage the citizens to participate in this service.</i></p>	PUBLIC WORKS DEPT. UTILITY DEPT.	Currently available
4.	<p>Develop a list of all maintenance activities required inside and outside of each municipal building; Identify which activities have an impact on storm water; and develop mitigation measures for each activity that impacts storm water.</p> <p><i>Measurable Goal: Develop a maintenance plan that decreases storm water pollution from Town building maintenance.</i></p>	PUBLIC WORKS DEPT.	By July 2014

5.	<p>Conduct building maintenance activities such that they do not impact the storm water systems and local water bodies whenever possible.</p> <p><i>Measurable Goal: Implement the maintenance plan that decreases storm water pollution from Town maintenance activities</i></p>	PUBLIC WORKS DEPT.	Continuously
6.	<p>Evaluate maintenance procedures for opportunities to reduce discharge into storm sewer systems from vehicle and equipment maintenance facilities.</p> <p><i>Measurable Goal: Decrease amount of storm water pollution from vehicle and equipment maintenance.</i></p>	PUBLIC WORKS DEPT.	By July 2014
7.	<p>All used motor oil from municipal vehicles will be properly recycled.</p> <p><i>Measurable Goal: Properly recycle all used motor oil.</i></p>	PUBLIC WORKS DEPT.	By July 2014
8.	<p>Develop a spill response plan and train all applicable personnel on proper response methods.</p> <p><i>Measurable Goal: Properly clean up all hazardous waste spills.</i></p>	PUBLIC WORKS DEPT.	By July 2014