

**NOTICE OF INTENT
FOR DISCHARGERS OF STORMWATER RUNOFF
ASSOCIATED WITH REGULATED SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS
AUTHORIZED UNDER NPDES GENERAL PERMIT ARR040000**

I. PERMITTEE INFORMATION New Renewal (Permit Tracking Number ARR04 _____)

Regulated Small MS4 Name: City of El Dorado, Arkansas Owner Type:
Mailing Address: P.O. Box 2170 FEDERAL STATE
Actual Street Address: 204 North West Avenue PUBLIC OTHER
City: El Dorado Urbanized Area _____
State: Arkansas Zip: 71730 County(ies): _____

Enter the Latitude and Longitude of the approximate center of the Small MS4 (A map must be included.):

Small MS4 Latitude: 33 degrees 12 minutes 26.85 seconds
Small MS4 Longitude: 92 degrees 39 minutes 49.44 seconds

II. PERMITTEE CONTACT INFORMATION

Name: Veronica Smith-Creer Telephone: 870-862-7911
Title: Mayor Email Address: execsecretary@eldorado.org

III. INVOICE MAILING INFORMATION

Invoice Contact Person: Veronica Smith-Creer City: El Dorado
Invoice Mailing Company: City of El Dorado State: Arkansas Zip: 71730
Invoice Mailing Address: P.O. Box 2170 Telephone: 870-862-7911

IV. CERTIFICATION OF PERMITTEE (See Part 5.7 of the general permit)

For a municipality, State, Federal, or other public agency: By either a principal executive officer or ranking elected official. For purposes of Part VI.H of the general permit, a principal executive officer of a Federal agency includes (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrator of EPA).

"I certify that the cognizant official designated in this Notice of Intent is qualified to act as a duly authorized representative under the provisions of 40 CFR 122.22(b). If no cognizant official has been designated, I understand that the Department will accept reports signed by the applicant. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information 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."

Responsible Official Printed Name: Veronica Smith-Creer Title: Mayor
Responsible Official Signature: Veronica Smith-Creer Date: 8/29/2019

V. COGNIZANT OFFICIAL DESIGNATION (Optional)

Cognizant Official Printed Name: Robert Edmonds Title: Public Works Director
Cognizant Official Signature: R Edmonds Date: 8.29.19
Telephone 870-862-7911 Email raedmonds@hotmail.com

VI. PERMIT REQUIREMENT VERIFICATION

Submittal of Complete NOI? Yes No Submittal of MS4 map? Yes No
Submittal of Complete Stormwater Management Program? Yes No

CITY OF EL DORADO, ARKANSAS

STORMWATER MANAGEMENT PROGRAM

SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)

ARR040000

October 2019



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1. Background and Context

The City of El Dorado, Arkansas Stormwater Management Program (SWMP) has been developed to provide policy and management guidance for activities affecting stormwater throughout the City of El Dorado. It is intended to assist in fulfilling State and Federal water quality requirements and meet local water resource management objectives. With the implementation of these policies and best management practices the City is intended to help prevent the discharge of stormwater that is detrimental to the local streams and waterways, and to develop and preserve the storm drainage infrastructure of the City of El Dorado as it continues to grow.

2. Description of Permit Area

The City of El Dorado currently serves a population of 18,884 people within its borders as of the 2010 Census. The geographic boundaries of the MS4 plan are the city limits and the plan for stormwater planning encompasses approximately 16.3 square miles. The City has authority and responsibility for planning, building, operating, maintaining and regulating the stormwater drainage systems within the city limits. Therefore, the MS4 NPDES permit for which this MS4 plan is submitted covers only the area within the city limits. This area includes creeks and tributaries that eventually empty into the Ouachita River, and the City's stormwater management practices will include cost-effective and efficient methods that will reduce or eliminate stormwater pollution and protect the riparian areas of these open waterways. These approaches provide natural pollutant removal and stormwater management capacity.

3. Purpose, Scope and Areas of Focus

The purpose of the Stormwater Plan is to characterize the City's entire stormwater drainage system, including both the open and piped systems, their connection to the streams, and the overall condition of the system. This characterization is necessary to address relevant State and Federal regulatory requirements and it provides baseline information on which to develop focused stormwater management strategies. This plan will then establish the goals, policies, and implementation actions that will achieve the City's long term objectives in a way that is understandable to the public, usable by the City's staff, and meets regulatory needs. The plan establishes a means for measuring, reporting, and managing the City's water resources by presenting benchmarks that will ensure meaningful progress, as well as ensuring compliance with applicable laws and permit requirements.

The Stormwater Plan addresses stormwater quality management policies and management practices that are, and/or will be implemented in the City. The scope of the Stormwater Plan is determined primarily by the Federal MS4 permit regulations, but is intended to address local water resources issues as well. These areas of focus in the Stormwater Plan include:

- ***Pollution incidents and unlawful (illicit) discharges to the City's stormwater drainage system.*** These discharges can be systematic (recurring) or episodic (occasional or one-time) discharges, and include pollutant runoff from parking lots, discharges from industrial outfalls, accidental spills, poor construction site management, and a variety of ways people dump pollutants into street gutters or catch basins.
- ***On-site management of stormwater to reduce the quantity of stormwater and pollution entering the drainage system.*** Similar to illicit discharges, events that cause flooding, system surcharges or ongoing pollutant loading can occur downstream from the city limits, and originate from a variety of causes. These

include inadequacies in the type and design of infrastructure, inadequate maintenance, insufficient erosion and/or sediment control practices, and increases in impervious area without provision for on-site infiltration of stormwater into the ground. The City regulates these issues through implementation of the El Dorado Municipal Code within the City limits.

- **Reduction and prevention of pollution at City facilities and resulting from City activities and business practices.** The City provides services with a potential for creating water pollution, erosion, and sedimentation. These include field activities such as ditch cleaning and excavation/maintenance activities, as well as activities at City facilities, such as vehicle washing and maintenance. The Federal NPDES Stormwater Program requires the City to implement pollution prevention practices that reduce or eliminate stormwater pollution from City activities.
- **Public education geared toward broad community stewardship of water resources.** The Federal NPDES Stormwater Program places significant emphasis on public education as part of the long-term solution to stormwater pollution. As such, education is a required element of the Stormwater Plan. The long-term success of the City's efforts will hinge on increased awareness and stewardship throughout the community. The Stormwater Plan will result in formal, organized educational and outreach efforts that are targeted broadly throughout the City.
- **Public awareness and involvement in the City's Stormwater management program.** Broad awareness and participation in the development and implementation of the Stormwater Plan by residents and local area businesses is a key component to ensure effectiveness of the Stormwater Plan. The Stormwater Plan includes a public involvement component in its development that meets the Federal NPDES program.
- **ADEQ required Municipal Separate Storm Sewer System (MS4) Plan elements.** The NPDES Stormwater Program requires that the City submit a MS4 plan in order to acquire a MS4 permit to legally discharge stormwater to the waters of the U.S.

The Federal rules and therefore, ADEQ's permit regulations, direct that the City's MS4 plan address six minimum area, which are termed "Minimum Control Measures." These areas are broadly titled in the rules as follows:

1. **Public Education and Outreach on Stormwater Impacts**
2. **Public Involvement/Participation**
3. **Illicit Discharges Detection and Elimination**
4. **Construction Site Stormwater Runoff Control**
5. **Post-Construction Stormwater Management in New Development and Redevelopment**
6. **Pollution Prevention/Good Housekeeping for Municipal Operators**

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

- The structural and nonstructural Best Management Practices (BMPs) that the permittee or another entity will implement for each of the stormwater Minimum Control Measures
- The measurable goals (Benchmarks) for each of the BMPs including, as appropriate, the months and years in which the permittee will undertake required actions, including interim milestones and the frequency of the action
- The person or persons responsible for implementing or coordinating the BMPs for the permittee's MS4 plan

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

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

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

4. Overview of El Dorado's Stormwater Drainage Systems

The City is responsible for implementing surface water management activities within its boundaries, including planning, design, construction, operation, and maintenance of the stormwater drainage system. The City performs all operation and maintenance on the public drainage system that is designed and constructed to City standards and located within easements or rights-of-way, or real property that has been conveyed or dedicated to the City.

The City also maintains drainage systems and open channels throughout the City and they outfall to natural streams within the City's jurisdiction. The geographic area covered by this program includes approximately 16.3 square miles inside the El Dorado city limits.

5. Stormwater Drainage Basin Characterization

The City's stormwater drainage system will use local creeks and their tributaries as major drainage routes. A drainage basin can be described as a geographic area within which stormwater drains from many small system converge on a larger drainage way, ultimately culminating in outfalls to the major drainage way. The character and condition of the drainage way varies significantly throughout the basins, depending on surrounding land uses and contributing drainages.

6. Goals, Policies, & Implementation Actions

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

Goal 1: Protect citizens and property from flooding

Policies:

- 1.1 Maintain surface drainage in the City to reduce the threat of flooding, through proper maintenance of the City's stormwater drainage system infrastructure, with practices that are protective of water quality.
- 1.2 Through the development review process, ensure that new development incorporates adequate stormwater management infrastructure to avoid downstream capacity and water quality problems.
- 1.3 Create and Preserve open stormwater drainage where feasible, to best accommodate peak storm flows, maintain flood storage capacity, and promote water quality.
- 1.4 Adhere to standards, policies, and practices which comply with Federal Emergency Management Agency (FEMA) Flood Management Program requirements to ensure that the City maintains flood insurance coverage under this program.

Implementation Actions:

- 1.1 Continue evaluation of City maintenance practices and implement appropriate BMPs to assure that the City adequately maintains the stormwater drainage system capacity in an environmentally responsible manner.
- 1.2 Evaluate and refine the City's drainage program, including educational outreach, inspection, and enforcement components to reduce the negative stormwater impacts from land alteration, erosion, sedimentation, and excessive runoff.
- 1.3 Implement BMPs consistent with NPDES Minimum Control Measure #1, Public Education and Outreach on Stormwater Impacts, to ensure that the public is aware of the importance of preventing pollution from entering the streams and water bodies of the State.
- 1.4 Implement BMPs consistent with NPDES Minimum Control Measure #4, Construction Site Stormwater Control, to minimize or eliminate erosion and sedimentation in the stormwater drainage system due to new construction.
- 1.5 Implement BMPs consistent with NPDES Minimum Control Measure #5, Post Construction Stormwater Management for New Development and Redevelopment, to ensure that new development is in compliance with flow-regulating management practices, such as detention ponds, on-site stormwater storage, etc.
- 1.6 Implement BMPs consistent with NPDES Minimum Control Measure #6, Pollution Prevention in Municipal Operations, to ensure adequate maintenance of the stormwater system.

Goal 2: Improve surface and sub-surface waters for aquatic life and other beneficial uses

Policies:

- 2.1 The City will monitor and implement practices and regulatory programs with the objective of improving surface and groundwater quality to, at a minimum, meet State water quality standards, adequately protect threatened and endangered wildlife, and meet the State beneficial use guidelines.
- 2.2 The City will maintain its open channels and waterways in a manner that is protective of their natural stormwater management and habitat functions for the benefit of the citizens of the City, local wildlife, including threatened or endangered species, and future generations.

Implementation Actions:

- 2.a Promote pollution protection educational efforts, including signage, development project review, and public outreach.
- 2.b Enhance erosion and illicit discharge detection and compliance efforts, including permitting and Code enforcement.
- 2.c Implement BMPs consistent with NPDES Minimum Control Measure #1, Public Education and Outreach on Stormwater Impacts, to enhance citizens' and businesses' knowledge regarding water quality regulations as well as the benefits to the community from properly functioning waterways.
- 2.d Implement BMPs consistent with NPDES Minimum Control Measure #3, Illicit Discharges Detection and Elimination, to eliminate or minimize toxic discharges from business and industry.
- 2.e Implement BMPs consistent with NPDES Minimum Control Measure #4, Construction Site Stormwater Runoff Control, to minimize sedimentation and channel degradation from construction sites.
- 2.f Implement BMPs consistent with NPDES Minimum Control Measure #5, Post- Construction Stormwater Management for New Development and Redevelopment, to ensure long-term functioning of newly-developed sites.
- 2.g Implement BMPs consistent with NPDES Minimum Control Measure #6, Pollution Prevention in Municipal Operations, to ensure that the stormwater drainage system is maintained in properly functioning condition.

Goal 3: Preserve and maintain surface waters, wetlands, and riparian areas

Policies:

- 3.1 Through the development review process, the City will ensure that development is protective of significant open waterways, wetlands, and riparian areas that meet historical, existing, and future needs.
- 3.2 The City will implement permitting programs, educational outreach, compliance inspections and enforcement activities as needed to reduce erosion, sedimentation, illicit discharges, and other pollution impacts to the City's waterways.

Implementation Actions:

- 3.a The City will review and refine its drainage program as necessary, which addresses erosion, sedimentation, and the impacts of land alteration, including permitting, inspections, technical educational and outreach, and enforcement.
- 3.b The City will review development proposals for impacts on open drainage ways, wetlands, and riparian areas, and protect the functions and benefits of these areas as provided for in the Code of Ordinances.
- 3.c The City will work cooperatively with citizens, businesses, and agencies to protect and improve surface waterways, seek opportunities for stewardship partnerships, further enhance educational opportunities, and continue participation in intergovernmental work groups.
- 3.d The City will implement and continue to refine/improve BMPs for City activities with potential to impact water quality and/or the functions of waterways, wetlands, and riparian areas.
- 3.e The City will implement BMPs consistent with NPDES Minimum Control Measure #4, Construction Site Stormwater Runoff Control, to reduce or eliminate sedimentation from construction sites as a contributor to poor water quality and quantity management.
- 3.f The City will implement BMPs consistent with NPDES Minimum Control Measure #5, Post-Construction Stormwater Management for New Development and Redevelopment, so new development at a minimum maintains the functioning of the stormwater drainage system, and doesn't contribute to future degradation.
- 3.g The City will implement BMPs consistent with NPDES Minimum Control Measure #6, Pollution Prevention in Municipal Operations, which is critical to maintaining properly functioning wetland and riparian areas and open channels, and the overall system.

Goal 4: To further Citizens, Businesses, and Industries understanding of the need to protect water quality

Policies:

- 4.1 The City will develop targeted education and outreach and technical assistance programs regarding practices and obligations for keeping debris and pollutants out of the stormwater drainage system and train stakeholder groups in appropriate erosion control and sediment prevention practices, as well as stormwater management BMPs.
- 4.2 The City will seek to form partnerships with neighborhoods or other community groups interested in providing stewardship of local waterways.
- 4.3 The City will develop, implement, and enforce appropriate building, design, and Municipal Codes to address water quality compliance issues, including pollution, habitat, and aesthetic issues, to encourage the development of urban waterways that are positive amenities in the community.

Implementation Actions:

- 4.a The City will continue to support outreach and education efforts regarding water quality, riparian and wetland areas, including business, contractor, and developer outreach programs to educate these parties about their impacts on stormwater quality.
- 4.b The City will continue to maintain enforcement and compliance activities, including inspections, technical assistance, and Code enforcement.
- 4.c The City will implement BMPs consistent with NPDES Minimum Control Measure #1, Public Education and Outreach on Stormwater Impacts, to engage the public in the efforts to create positive urban amenities.
- 4.d The City will implement BMPs consistent with NPDES Minimum Control Measure #3, Illicit Discharges Detection and Elimination, to ensure that waterways are safe, meet State water quality standards, and can function as to the whole region.

Goal 5: Urban drainage ways become community amenities

Policies:

- 5.1 The City will conduct education and outreach activities to appropriate target groups to increase understanding of the importance of maintaining safe and clean drainage ways, and to seek volunteers to be caretakers for water features near them.
- 5.2 The City will, through its Code of Ordinances, protect existing significant open waterways and encourage site planning and landscaping that enhances the attractiveness and natural functions of the water features.
- 5.3 The City will maintain all drainage ways in a manner that provides for safe and attractive conditions within the limits of its fiscal constraints.

Implementation Actions:

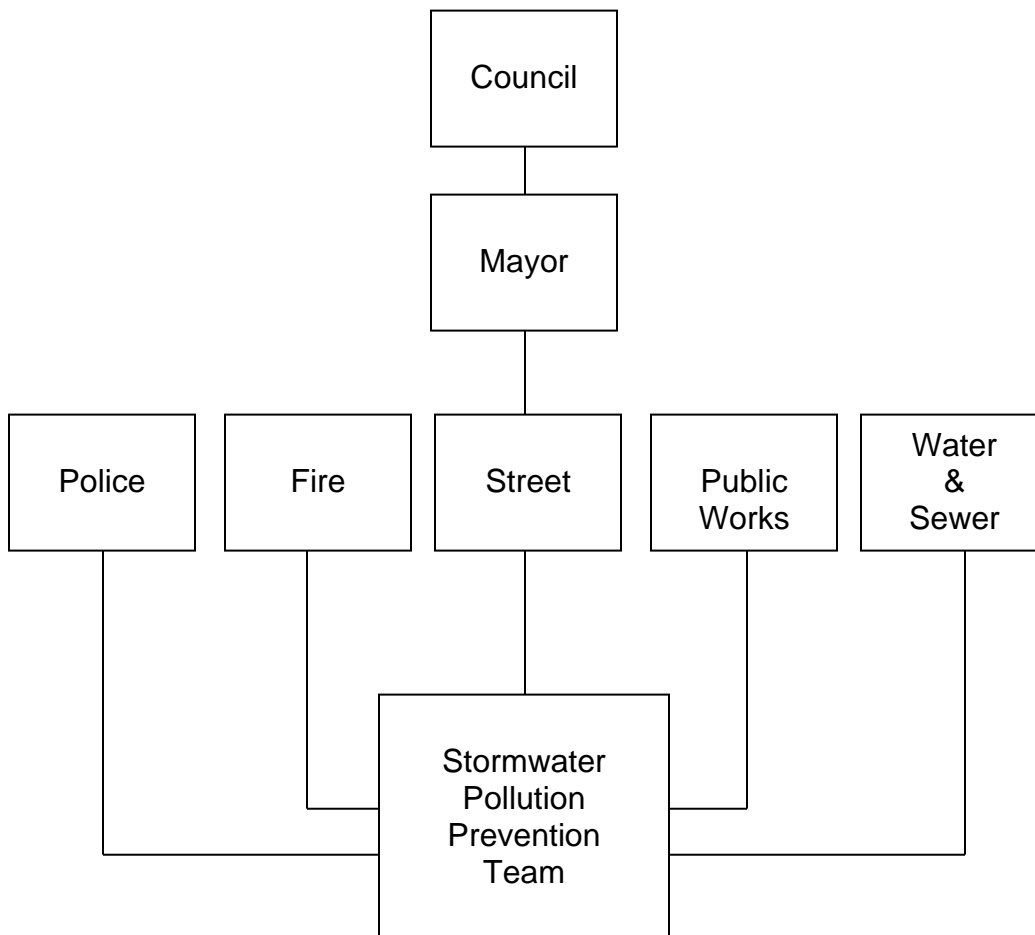
- 5.a Enhance the City's erosion control program, including educating developers and the community regarding the positive aspects of open waterways to promote acceptance, and integrating effective compliance and enforcement components.
- 5.b Provide adequate funding within the City's restraints for public maintenance of the stormwater drainage system, and ensure ongoing maintenance of private stormwater features through development agreements.
- 5.c Increase educational outreach to schools to increase awareness of children regarding the need to keep litter and pollutants out of urban drainage ways.
- 5.d Implement all six of the NPDES Minimum Control Measure BMPs. Implementing all of the provisions of the SWMP will ultimately result in improved water quality and quantity management, improved habitat and resource protection, and, ultimately, enhance urban waterways as desirable community amenities.

7. El Dorado's NPDES MS4 Program

City Stormwater Management Program Responsible Parties

The City is responsible for implementing surface water management activities within its boundaries, including the planning, design, construction, operation and maintenance of the stormwater drainage system. In response to the NPDES Phase II stormwater requirements, the City has developed a MS4 plan addressing each of the six required Minimum Control Measures, as specified in the Federal-NPDES Phase II rules. The City's stormwater management program is the responsibility of the Public Works Department. However, other departments within the City of El Dorado will receive training to recognize stormwater issues related to their facility, the fieldwork they do, and reporting stormwater issues to the Public Works Director for review and action.

Organization Chart



Veronica Creer, Mayor of El Dorado

870.862.7911

Robert Edmonds, Public Works Director

870.863.4244

8. NPDES Phase II BMP Requirement

Specific BMPs are proposed for each Minimum Control Measure, which are intended to support the reduction of discharges of pollutants in stormwater runoff to the maximum extent practicable (MEP) as required by the Federal NPDES Phase II rules. Each Minimum Control Measure section provides the following information:

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

The BMP schedule shows when certain activities will be completed on a calendar year basis. The NPDES Phase II rules provide for a five-year implementation schedule. The Stormwater Management Program was submitted in October 2019. Therefore, the BMP implementation schedule lays out a five-year schedule starting with January 2020 once approved.

Control Measure 1

Public Education and Outreach on Stormwater Impacts

Regulatory Requirements

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

As stated in the Regulatory Requirements the City will inform community. With the City informing the citizens and as they become more knowledgeable, they will understand the reasons why this program is important.

The City of El Dorado will implement a public education program to distribute educational materials to the community and conduct outreach activities about the impacts of stormwater discharges on local water bodies and the steps that can be taken to reduce stormwater pollution.

Rationale and Implementation

In order to cover a wide range of audiences including government staff, the general public, and youth, multiple outreach genres and methods must be used (booths and materials at local festivals, newspaper articles, school programs, etc.). Once topics have been identified, fact sheets, newsletters, press releases, and Public Service Announcements (PSAs) will be developed, adapted, and/or gathered for distribution at public meetings, in support of presentations, and with educational displays. Stormwater management and pollution prevention messages will be provided to participating MS4s for inclusion in municipal utility bill mailings to their residents.

The City of El Dorado will work with other government entities within the City of El Dorado in order to approach the community in the best way. The City will contact other environmental or industrial organizations since they may already have educational materials and performs outreach activities.

The City will need to develop a plan to distribute educational materials and activities that are relevant to local situations and issues.

The City will use a combination of methods such as brochures, event participation, educational programs, city website, posters, and displays around town, newspapers, events the City host each year.

The City can use a mix of local strategies to address the viewpoints and concerns of a variety of audiences and communities, including minority and disadvantaged communities, as well as children. The City will print brochures and fact sheets in order to reach audiences less likely to read other materials. The City will make an effort to direct materials and outreach towards specific groups or entities likely to have a significant stormwater impact.

The City can educate the public on pollution prevention activities such as proper use and storage of fertilizers; proper use and storage of pesticides; pet waste management; disposal of household hazardous waste, managing yard debris and composting; water conservation; litter

prevention; and many others as well as provide training to reduce pollution to construction personnel.

Responsibility

The City's Public Works Director and his office will be the primary coordinator of the BMPs related to the Public Education and Outreach. He will work within his office and other departments and committees throughout the town to enhance the message and distribution of education literature related to water quality.

Robert Edmonds, Public Works Director
City of El Dorado, Arkansas
City Hall 870.863.4244

Measurable Goals

The City of El Dorado will address the requirements and intent of the public education and outreach. The stormwater public education and outreach program shall reach at least 50 percent of the population.

The City will focus on developing and distributing the public education materials to start with information and the most typical sources of pollutants in stormwater runoff and the impacts associated with those pollutants, and making this information available as educational handouts, and flyers.

Educational programs for the schools could include focus on the water cycle, watersheds, stormwater and water quality through school programs, handouts, or events.

Future activities will include outreach presentations, advertisements, and workshops for the public, businesses, industry, and various other stakeholders, to educate them on impacts that the City's stormwater management program may have, and what they can do to improve stormwater quality.

Summary of measurable goals

The City of El Dorado along with any partners with which it may engage for purpose of the SWMP, may use public events, periodic neighborhood surveys, and consultation with community and citizen group leaders to solicit feedback on specific education/outreach efforts. Any specific goal identified will be described in detail on the annual report.

Implement a public education program to distribute two materials within the school district. During the five-year period, one material will go to a certain grade between 5th-8th grade, and the second materials will go to a certain grade between 9th-12th reaching students in each age group during the year.

Conduct outreach activities about the impact of stormwater discharges on water bodies and the steps to take to reduce pollutants in stormwater.

Implement and Educate Public, Land, and Development Community on Best Management Practices, and Stormwater Runoff, and Car Washes.

Stormwater education materials can be printed in the newspaper twice a year.

Development/Implementation Schedule Summary

The measurable goals for each of the BMPs, at minimum measurable goals shall be implemented to satisfy the general permit's performance standards.

The annual reporting shall identify what the City implemented and if it was successful by how many people attended or were reached by public involvement.

BMP	Goal
Implement a public education program to distribute materials.	The City will distribute and develop materials twice a year. Once to grades 5 th -8 th and the second to grade 9 th -12 th .
Conduct outreach activities about the impact of stormwater discharges on water bodies and the steps to take to reduce pollutants in stormwater.	The City will develop a program to educate, seminars, the public on the proper collection and disposal of contaminants.

Control Measure 2

Public Involvement and Participation

Regulatory Requirements

Regulation 40 CFR 122.34(b)(2): “The permittee shall, at a minimum, comply with State and local public notice requirements when implementing a public involvement/ participation program.”

The City of El Dorado can provide input and assistance to small municipal stormwater management programs. The public will be given opportunities to contribute in both the development and implementation of the program. An active and involved community will make the program a success because it allows: public support since citizens have a responsibility in the development and decision making of the program, when the community is involved the City can reach goals faster due to obstacles, citizens can offer expertise and economic benefits since the community can be a valuable resource, and the community can provide the City with other programs through community and governments.

The City will continue to comply with applicable state and local public notice requirements.

Rationale and Implementation

The City of El Dorado can combine traditional methods of soliciting public input with some alternative advertising methods as well. Newspaper can be combined with radio, television, postings at bus stops, newsletters, announcements at group or event meetings, flyers, mass mailings.

The City of El Dorado notification program will target specific population sectors, including ethnic, minority, low-income communities, academic institutions, educational institutions, neighborhood groups, community groups, outdoor groups, businesses and industry. The goal is to involve a diverse group of people who can offer a variety of concerns and ideas concerning the program.

The City is working through local neighborhood groups, and schools to continue a public involvement/participation program. Components of this program will include organizing citizen participation in public involvement events such as litter pick up, establishing rain gardens, planting vegetation, etc.). The City will contact Main Street and The Chamber of Commerce within the City for their input.

Some examples of public involvement and participation activities that the City can if able implement include:

- Volunteer “Keep El Dorado Beautiful” with city-wide clean up days.
- Have “Keep El Dorado Beautiful” sponsor Adopt a Street Program.

The City of El Dorado has involved the community in the development of its NOI and SWMP by including input from local engineering firms.

Responsibility

The City’s Public Works Director and his office will be the primary coordinator of the BMPs related to the Public Participation and Involvement.

Robert Edmonds, Public Works Director
City of El Dorado, Arkansas
City Hall 870.863.4244

Measurable Goals

The City of El Dorado will utilize a 5 year integrated approach to address the requirements and intent of the public participation and involvement. The stormwater public involvement and participation program shall include at least five public involvement activities over the permit term.

The 5 year approach will include the following goals:

Notify the public so the citizens are aware of the MS4 plan development, and they will be receiving information (newspaper, newsletters, postings at City Hall, Flyers, Mailings, etc). Once a year, publish a public notice in the local newspaper with an update on the MS4 plan development.

Notify the public of meetings and activities regarding MS4’s NPDES activities through media outlets. Once a year, plan a public meeting to discuss ideas on public outreach with the MS4 plan development.

Through the City public meetings or mailouts, the City can receive input from the public to assist with the development of SWMP and BMP Manual.

Summary of measurable goals

Best Management Practices to comply with state and local public notice requirements when implementing public involvement through city outlets about meetings and activities where community involvement is concerned.

Development/Implementation Schedule Summary

The measurable goals for each of the BMPs, at minimum measurable goals shall be implemented to satisfy the general permit’s performance standards.

The annual reporting shall identify what the City implemented at each activity conducted, including a brief description of the activity and including an estimate of how many people participated. When media such as radio, newspaper, etc are used reporting data shall be based on the average listening/viewing audience reported by the media source. The City will be able to measure the public involvement success by the attendance of any events held.

BMP	Goal
Comply with state and local public notice requirements when implementing a public involvement and participation program	Notify the public through media about meetings and activities
Develop a SWMP that allows the public opportunities to participate	Receive input from public to assist with development of SWMP and BMP Manual

Control Measure 3

Illicit Discharge Detection and Elimination

Regulatory Requirements

Regulation 40 CFR 122.34(b)(3): The permittee must:

- *Develop, implement and enforce a program to detect and eliminate illicit discharges [as defined in 40 CFR §122.26(b)(2)] into the permittee's small MS4, including notifying adjacent interconnected MS4 when discharges occur;*
- *Develop and continue to update a storm sewer system map, showing the location of all outfalls and the names and location of all waters that receive discharges from those outfalls, including catch basins, pipes, ditches and public and private stormwater facilities;*
- *Effectively prohibit (through ordinances or other regulatory mechanisms to the maximum extent allowable under Local, State, and Federal laws) non-stormwater discharges into the permittee's storm sewer system and implement appropriate enforcement procedures and actions for non-compliance;*
- *Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the permittee's system;*
- *Inform public employees, businesses, and the general public of the hazards associated with illegal discharges and improper disposal of waste to the stormwater system;*
- *Address all categories of non-storm water discharges or flows (illicit discharges) if identifies as significant contributor of pollutants to the permittee's small MS4;*
- *Develop a list of occasional incidental non-storm water discharges that will NOT be addressed as illicit discharges because of reasonable expectations (based on information available) that the source would not be a significant source of pollutants. These will primarily be due to the nature of the discharges or conditions the City of El Dorado's storm water management program plan has established for allowing these discharges to the permittee's MS4; and*
- *Develop a process to respond to and document complaints relating to illicit discharges.*

Illicit discharges enter the system through either direct connections, wastewater piping not connected to a storm drain, or indirect connections, infiltration in the MS4 from cracked sanitary sewers, spills collected by drain outlets, or anything dumped directly into the drain. The result in untreated discharges that contribute high levels of pollutants, including metals, toxics, oil, grease, viruses, and bacteria to receiving water bodies.

The EPA recognizes the adverse effects illicit discharges can have on receiving waters. The City of El Dorado will continue and implement and enforce an illicit discharge detection and elimination program over the next 5 years that includes:

A storm sewer system map, showing the location of major outfalls and the names and location of water of the United States that receive discharges from those outfalls.

A storm sewer system map, showing the entire MS4 system including catch basins, pipes, ditches, and public and private stormwater facilities. An ordinance on non-storm water discharges into the MS4, and appropriate procedures and actions.

Educate public employees, businesses and the general public about the hazards associated with illegal discharges and improper disposal of waste.

Rationale and Implementation

The City of El Dorado illicit discharge detection and elimination program objective is to gain a thorough awareness of its system in order to determine the types and sources of illicit discharges entering the system and establish the legal, technical and educational means needs to eliminate these discharges. The City can use the following general guidelines in order to meet this objective:

The storm sewer map is meant to demonstrate a basic awareness of the intake and discharge areas of the system. It will help determine the extent of discharged flows, and what the flows are affecting. Throughout the permit term of 5 years the City will begin to develop a map and continuing developing a map of the entire MS4 storm sewer system. The City will update the map as necessary.

The City will adopt a Stormwater Ordinance which includes prohibition of illicit discharges and illegal dumping and fines for violations.

The plan to detect and address illicit discharges to the MS4 system will be a part of the City's detection and elimination process. The plan includes several factors including available resources, size of staff, and the degree and character of its illicit discharges. The plan will include the following steps: Locate problem areas, water line flushing, landscape irrigation, lawn watering, car washing, areas with old sewer lines, flows from emergency fire fighting activities. The City of El Dorado will locate problem areas where there may be illicit connections, and develop a procedure for assessment and removal of the source.

Responsibility

The City's Public Works Director and his office will be the primary coordinator of the BMPs related to the Illicit Discharge Detection and Elimination. The water and sewer department, fire department and police department will work with the public works department within the City offices.

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Measurable Goals

The City of El Dorado will utilize a 5 year integrated approach to address the requirements and intent of the Illicit Discharge Detection and Elimination.

The 5 year approach will include the following goals:

The City of El Dorado will develop a storm sewer map, and develop an ordinance for the City for Illicit Discharges and the procedures to enforce this action. The City and Public Works Director will work with each Utility Department to verify areas when developing the map over this period of time. The City of Public Works Director will discuss and provide a draft ordinance to the City Council, enforcement actions will need to be discussed by the City and the City Attorney before any ordinance is adopted.

The City will track the number and document the type of calls received and the actions taken each year.

The City will track the number of illicit discharges that are encountered and document enforcement procedures according to the future City Ordinance.

The City will maintain a point of contact for the public to report illicit discharges.

The City will educate city agencies about illicit discharges and the procedures for reporting illicit discharges.

The City will educate industries, businesses and public about illicit discharges and the means to eliminate them.

The City may use public education programs to educate and inform public employees and business about hazards associated with illicit discharges.

Summary of measurable goals

The City will need to develop a storm sewer map in the next 5 years, with improvements and updates annually. This map will be an ongoing process to initially prepare and continually update any changes. The map can be updated as necessary by Robert Edmonds, Public Works Directors with the other city utilities of any changes made in the field or additions made.

The City will need to develop a plan to detect and eliminate illicit discharges through connection. The City will maintain a point of contact for the public to report illicit discharges. The point of contact is the City’s Public Works Director.

Development/Implementation Schedule Summary

The measurable goals for each of the BMPs, at minimum measureable goals shall be implemented to satisfy the general permit’s performance standards.

BMP	Goal
Develop a Storm Sewer Map	Develop the map within the next 5 years, updating annually as needed.
Develop a Illicit Discharge Ordinance	Develop the Ordinance and implement enforcement procedures.
Educate and Inform the public, employees, and businesses about the hazards associated with illicit discharges	Develop the Map, the Ordinance, and educate the public through a public means to inform the public about illicit discharges, reporting illicit discharges, and how they can be avoided.

Control Measure 4

Construction Site Storm Water Runoff Control

Regulatory Requirements

Regulation 40 CFR 122.34(b)(4):

The permittee shall develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the 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 the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. For stormwater discharges associated with small construction activity in accordance with 40 CFR 122.26(b)(15)(i), the permittee will develop, implement, and enforce a program to reduce pollutant discharges from such sites. The permittee's program must include the development and implementation of, at a minimum:

- 1. 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, Tribal, or local law;*
- 2. Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;*
- 3. 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;*
- 4. Procedures for site plan review which incorporate consideration of potential water quality impacts;*
- 5. Procedures for receipt and consideration of information submitted by the public, and*
- 6. Procedures for site inspection and enforcement of control measures.*

Rationale and Implementation

The City of El Dorado recognizes that polluted stormwater runoff from construction sites can often flow into the storm sewer and then ultimately is discharged into local rivers and streams. Pollutants commonly discharged from construction sites can include sediment, wastes, oil and grease, concrete truck washout, construction chemicals, and debris.

The City of El Dorado will develop and will continue to develop and implement and enforce a program to reduce pollutants in stormwater runoff from construction activities. This will include a Stormwater Ordinance. Construction plans that are submitted for approval will be reviewed for compliance with the City's Ordinance. A Storm Water Pollution Prevention Plan (SWPPP) and Notice of Intent (NOI) is required from Arkansas Department of Environmental Quality (ADEQ) if the disturbed area is greater than or equal to one (1) acre or less than one acre if that construction activity is part of a larger common plan of development.

The City will inspect and enforce any of their construction projects weekly and violations will be documented. Violations will be reported to the Contractor, and if violations are not corrected, a Stop Work Order will be issued.

Responsibility

The City's Public Works Director and his office will be the primary coordinator of the BMPs related to the Construction Site Runoff Control.

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Measurable Goals

The City of El Dorado will utilize a 5 year integrated approach to address the requirements and intent of the Construction Site Runoff Control.

Summary of measurable goals

Within the 5 year approach the following measurable goals may include:

Create a Stormwater Maintenance Ordinance

Adopt a Stormwater Maintenance Ordinance, which require erosion and sediment controls

Develop a Site Plan Submittal and Review Process for Construction Plans within the City, and require requirements for submittal through ADEQ for permits

Develop a Construction Site Inspection Program

Establish requirements for contractors to construct and maintain erosion and sediment control measures for the construction activity.

Conduct education seminars for contractors on waste associated with their profession that may cause adverse impacts to the water quality.

Development/Implementation Schedule Summary

The measurable goals for each of the BMPs, at minimum measurable goals shall be implemented to satisfy the general permit's performance standards.

BMP	Goal
Develop and Implement a Program to reduce pollutants in any stormwater runoff that enters the small MS4 from construction activities	Develop and Adopt an Stormwater Ordinance to enforce stormwater maintenance, and will require erosion and sediment controls
Develop and Implement a Program to reduce pollutants in any stormwater runoff that enters the small MS4 from construction activities	Develop a submittal process for construction plans for review for all projects requiring NPDES permitting, and other ADEQ permits such as SWPPP

Develop a Construction Inspection Program	Develop a program for site inspections by the City to enforce the Stormwater Ordinance, and required proper stormwater permits from ADEQ and any violations will be documented, and further violations will require a stop work order.
Develop a Construction Inspection Program	The City will conduct a seminar for contractors on waste associated with their profession and impacts to water quality.

Control Measure 5

Post-Construction Storm Water Management in New Development and Redevelopment

Regulatory Requirements

Regulation 40 CFR 122.34(b)(5): The permittee must:

- A. Develop, implement, and enforce a program to address stormwater 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 the small MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts;*
- B. Develop and implement strategies which include a combination of structural and/or non- structural best management practices (BMPs) appropriate for the community;*
- C. 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*
- D. Ensure adequate long-term operation and maintenance of BMPs.*

Rationale and Implementation

The City of El Dorado post-construction runoff program's objective is to reduce pollutants in post-construction runoff from new development and redevelopment projects that result in any land disturbance. The city's program consists of the following items in support of this objective.

Develop and maintain an ordinance requiring the implementation of post-construction runoff controls.

Develop and Implement strategies, which include a combination of structural and non-structural BMPs, and determine the appropriate BMPs for this goal.

Non-Structural BMPs:

Planning and Procedures – Runoff problems can be addressed efficiently with sound planning procedures. Master plans and zoning ordinances can promote improved water quality by guiding the growth of a community away from sensitive areas and by restricting certain types of growth to areas that can support it without compromising water quality.

Site-Based Local Controls – These controls can include buffer strip and riparian zone preservation, minimization of disturbance and imperviousness, and maximization of open space.

Low Impact Development – The City highly encourages and supports environmentally sustainable building design, construction and planning for low impact development. The City's building and planning codes allow for consideration of any development designs which utilize new or existing technologies for energy efficiency, water quality, air quality, etc.

Structural BMPs:

Water Quality Practices – All new construction projects regardless of size of required submitting a post construction stormwater quality plan with the SWPPP permit submittal. The City will review each proposed plan to ensure that the quality devise is sufficient to remove debris. The City will work with engineering firms to determine exact specifications for water quality devices. Some examples would be, curb inlets, detention ponds, junction box, vegetated buffer strips, sand filters, and rain gardens.

Responsibility

The City’s Public Works Director and his office will be the primary coordinator of the BMPs related to the Construction Site Runoff Control.

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Measurable Goals

The City of El Dorado will utilize a 5 year integrated approach to address the requirements and intent of the Post-Construction Runoff Control. Measurable Goals include:

Maintain a Stormwater Maintenance Ordinance, which includes post-construction runoff control measures, and long-term operation and maintenance.

Continue to develop BMPs for structural and non-structural

Summary of measurable goals

Within the 5 year approach the following the City will create an ordinance which includes post-construction runoff control measures. It will address both construction and post-construction runoff control in order to comply with NPDES regulations. This mechanism provides the city with the tool to manage and enforce its storm water management practices.

Development/Implementation Schedule Summary

The measurable goals for each of the BMPs, at minimum measureable goals shall be implemented to satisfy the general permit’s performance standards.

BMP	Goal
Create and Adopt a Ordinance for Post-Construction Runoff	Develop and Adopt a Post – Construction Runoff Ordinance. Continue to develop strategies for BMPs.

Control Measure 6

Pollution Prevention/Good Housekeeping for Municipal Operations

Regulatory Requirements

Regulation 40 CFR 122.34(b)(6): The permittee must:

- A. *Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and*
- B. *Using training materials that are available from EPA, ADEQ, other organizations, or developed in-house, the program must 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.*

Rationale and Implementation

The City of El Dorado will play a major role in the pollution prevention/good housekeeping for the stormwater management program. This control measure will allow the city to ensure their own actions help to reduce in the amount and type of pollution. This includes work such as collects on streets, parking lots, open spaces, storage areas, and vehicle maintenance areas and is discharges into local waterways.

This is meant to improve and protect receiving water quality by altering city or facility operations. It also can result in a cost savings for the city, since proper and timely maintenance of storm sewer system can help avoid costs for repairs from damages.

The City of El Dorado's objective in developing a pollution prevention/good housekeeping program is to ensure that existing city, state, or federal operations are performed in ways that will minimize contamination of storm water discharges. The City can use the general guidance below to meet this objective:

Maintenance activities, maintenance schedules, and long-term inspections procedures for structural and non-structural controls to reduce pollutants discharged from separate storm sewers.

Controls for reducing or eliminating the discharge of pollutants from areas such as roads and parking lots, maintenance and storage yards and transfer stations. These controls can have regular street sweeping and programs that promote recycling.

Responsibility

The City's Public Works Director and his office will be the primary coordinator of the BMPs related to the Pollution Prevention/Good Housekeeping. Other City Departments will work with the public works director.

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Measurable Goals

The City of El Dorado will utilize a 5 year integrated approach to address the requirements and intent of the Pollution Prevention/Good Housekeeping which will include:

Perform annual site inspections of each city facility with regard to stormwater runoff and materials storage. This could include the Water and Wastewater Departments, City Park Departments, etc.

Develop and hold training classes for all employees to prevent and reduce runoff from the MS4 operations.

Summary of measurable goals

Within the 5 year approach the City will continue to develop and implement and operation and maintenance program that includes a training component to prevent and reduce pollutant runoff. This can include annual site inspections of each facility with regard to stormwater runoff.

Development/Implementation Schedule Summary

The measurable goals for each of the BMPs, at minimum measurable goals shall be implemented to satisfy the general permit's performance standards.

BMP	Goal
Site Inspections	The City will inspect City facilities, but this can also include clean up days within the city promoting maintenance and pollution prevention
Training	The City can inform on how to prevent and reduce runoff with the city, and can hold classes with materials on stormwater training.