



Richard E. Dunn, Director

Watershed Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

April 7, 2020

RECEIVED APR 27 2020

Ms. Katie Beth Jennings, Environmental Services Manager
Columbia County
P.O. Box 498
Evans, Georgia 30809

RE: Phase II MS4
NPDES Permit No. GAG610000
Storm Water Management Program

Dear Ms. Jennings:

In a January 21, 2020 letter, the Environmental Protection Division provided comments on Columbia County's Storm Water Management Program (SWMP). The County submitted a revised SWMP document on March 3, 2020. Based on our review, we have determined the SWMP document is acceptable.

Thank you for your cooperation in this matter. If you have any questions, please contact me at 404-651-8541.

Sincerely,

Mallory Warren
Environmental Compliance Specialist
Stormwater Unit

STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Storm Water Management Program (SWMP)
General NPDES Permit No. GAG610000 for
Small Municipal Separate Storm Sewer Systems (MS4)

1. **General Information**

- A. Name of small MS4: Columbia County, Georgia
- B. Name of responsible official: Douglas R. Duncan
Title: Chairman, Columbia County Board of Commissioners
Mailing Address: P.O. Box 498
City: Evans State: GA Zip Code: 30809
Telephone Number: 706-868-3379
- C. Designated stormwater management program contact:
Name: Katie Beth Jennings
Title: Environmental Services Manager
Mailing Address: P.O. Box
City: Evans State: GA Zip Code: 30809
Telephone Number: 706-447-6700
Email Address: kjennings@columbiacountyga.gov

2. **Sharing Responsibility**

- A. Has another entity agreed to implement a control measure on your behalf?
Yes _____ No (If no, skip to Part 3)

Control Measure or BMP:

1. Name of entity _____

2. Control measure or component of control measure to be implemented by entity on your behalf:

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

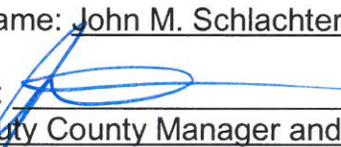
3. Minimum Control Measures* and Appendices

- A. Public Education and Outreach
- B. Public Involvement/Participation
- C. Illicit Discharge Detection and Elimination
- D. Construction Site Stormwater Runoff Control
- E. Post-Construction Stormwater Management in New Development and Redevelopment
- F. Pollution Prevention/Good Housekeeping
- G. Appendix – Enforcement Response Plan
- H. Appendix – Impaired Waters

4. Certification Statement

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

Printed Name: John M. Schlachter Date: 2/28/2020

Signature:  _____

Title: Deputy County Manager and acting Engineering Services Division Director

Minimum Control Measure #1

Public Education and Outreach on Stormwater Impacts

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

MCM 1: Public Education and Outreach

Best Management Practice (BMP) #1

1. Target Audience: Citizens
2. Description of BMP: Ongoing social media program. Educate citizens on stormwater related issues through the use of posts on social media. The topics to be addressed will focus on stormwater quality and how local citizens can get involved.
3. Measurable Goal(s):
 - At least one social media post will be made annually.
4. Documentation to be submitted with each annual report:
 - A copy of the mailing insert and the number of customers it reached.
5. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2020
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Annually
6. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
7. Rationale for choosing BMP and setting measurable goal(s): Many local citizens are not aware of the harms of water pollution and urban runoff. The current lack of knowledge will be offset by the distribution of educational material.
8. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be determined by the number of complaints received about stormwater related issues.

MCM 1: Public Education and Outreach

Best Management Practice (BMP) #2

1. Target Audience: Citizens
2. Description of BMP: The Environmental Management and Floodplain Management webpages on the Columbia County website will be used to provide information and facts on topics such as stormwater quality, issues, and hot topics. Information on Stormwater Management projects will be made available through the Columbia County at Work page.
3. Measurable Goal(s):
 - Record the number of hits to the Environmental Management, Floodplain Management, and Columbia County at Work pages.
 - Update the website annually.
4. Documentation to be submitted with each annual report:
 - The number of hits on the three webpages.
 - Screenshots of any updates to the three webpages.
5. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): March 2003
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Annually
6. Person (position) responsible for overall management and implementation of the BMP: Project Manager
7. Rationale for choosing BMP and setting measurable goal(s): Many citizens do not know how County resources are utilized for stormwater projects nor are they aware of stormwater quality impacts, issues, and hot topics. The website will be a constant source of this information.

8. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by the number of hits to these pages.

MCM 1: Public Education and Outreach

Best Management Practice (BMP) #3

1. Target Audience: 5th grade students
2. Description of BMP: Stormwater Utility will partner with Columbia County Extension Services 4-H Program to educate 5th grade students on stormwater pollution and prevention.
3. Measurable Goal(s):
 - Present the water pollution program to each 5th grade class in Columbia County.
4. Documentation to be submitted with each annual report:
 - The number of students reached and a copy of the curriculum.
5. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2003
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): November
6. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
7. Rationale for choosing BMP and setting measurable goal(s): Youth do not often understand the connection between pollution and water resources. Using local schools to disseminate this information will promote environmental conscientiousness in the community from an early age.
8. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be determined by giving a random sampling of students a verbal quiz on stormwater prior to the lesson and then repeating the quiz after the lesson.

MCM 1: Public Education and Outreach

Best Management Practice (BMP) #4

1. Target Audience: Developers, builders, and contractors
2. Description of BMP: Education of developers, builders, and contractors. A newsletter, the Enviro-Source, will be created focusing on soil erosion and sediment control problems and solutions along with associated environmental regulation. The newsletter will be emailed out to all developers, builders, and contractors whose contact information is located on a Notice of Intent and/or Land Disturbance Permit.
3. Measurable Goal(s):
 - Publish the Enviro-Source Newsletter annually and distribute it via email to builders, developers, and contractors who may be involved with E&S BMPs.
4. Documentation to be submitted with each annual report:
 - A copy of the Enviro-Source and the number of individuals it was emailed to.
5. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2003
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Annually
6. Person (position) responsible for overall management and implementation of the BMP: Project Manager
7. Rationale for choosing BMP and setting measurable goal(s): Development is a booming business in Columbia County. This BMP was chosen to target those conducting land disturbing activities in order to reduce sediment discharge into natural resources and compliance with environmental regulation.
8. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of newsletters that are distributed each year.

Minimum Control Measure #2

Public Involvement/Participation

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

MCM 2: Public Involvement and Participation

Best Management Practice (BMP) #1

1. Target audience/stakeholder group: Engineers, developers, and citizens
2. Description of BMP: Local stormwater management panel, the Drainage Basin Advisory Council. The Columbia County Board of Commissioners will appoint a council of seven volunteer citizens to serve. The council should provide input on current stormwater issues and offers suggestions for improving public education and involvement. The council should also discuss stormwater pollution issues in the County.
3. Measurable Goal(s):
 - The stakeholders group will hold meetings at least twice per year.
4. Documentation to be submitted with each annual report:
 - A copy of the sign-in sheet and the agenda.
5. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Twice annually
 - d. Month/Year of each action (if applicable): Twice annually
6. Person (position) responsible for overall management and implementation of the BMP: Project Manager
7. Rationale for choosing BMP and setting measurable goal(s): Forming a stakeholders group will allow the citizens of Columbia County to have a direct impact and influence on stormwater issues within the County.
8. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be determined by tracking attendance at the Council meetings.

MCM 2: Public Involvement and Participation

Best Management Practice (BMP) #2

1. Target audience/stakeholder group: Citizens of Columbia County
2. Description of BMP: Citizen hotline. The County provides a County-wide resource for non-emergency public services via 3-1-1. The 3-1-1 center accepts calls from citizens with questions, concerns, or service requests regarding stormwater.
3. Measurable goal(s):
 - Perform service requests for stormwater-related issues stemming from the 3-1-1 citizen hotline.
 - The county will investigate the complaint within three business days.
4. Documentation to be submitted with each annual report:
 - Provide the number of stormwater-related service requests conducted.
 - A master spreadsheet of the complaints received to include information on resolution.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Ongoing
6. Person (position) responsible for overall management and implementation of the BMP: Project Manager
7. Rationale for choosing BMP and setting measurable goal(s): A citizen hotline is a valuable resource in order to respond to concerns in the community.
8. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP may be determined by the number of service requests we respond to each year.

MCM 2: Public Involvement and Participation

Best Management Practice (BMP) #3

1. Target audience/stakeholder group: Citizens
2. Description of BMP: Adopt-A-Stream. Columbia County will partner with citizen science monitoring organization, Adopt-A-Stream, to monitor Reed Creek for water quality parameters to include conductivity.
3. Measurable goal(s):
 - Conduct at least one sampling event annually.
4. Documentation to be submitted with each annual report:
 - Sampling date(s) and results.
5. Schedule:
 - a. Interim milestone dates (if applicable): N/A
 - b. Implementation date (if applicable): 2018
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Annually
6. Person (position) responsible for overall management and implementation of the BMP: Project Manager
7. Rationale for choosing BMP and setting measurable goal(s): Reed Creek has a TMDL for fecal coliform. We will partner with citizens to gather more data on this Creek and spread awareness on its impairment, possible contributors, and prevention practices.
8. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: The effectiveness of this BMP will be determined by how many sampling events are conducted annually.

MCM 2: Public Involvement and Participation

Best Management Practice (BMP) #4

1. Target audience/stakeholder group: Citizens of Columbia County
2. Description of BMP: Pet waste stations. Columbia County will partner with the Friends of Euchee Creek to supply and stock pet waste stations along a section of the Greenway.
3. Measurable Goal(s):
 - Stock the pet waste stations with bags as needed, at least annually.
4. Documentation to be submitted with each annual report:
 - A spreadsheet of the dates and amount of bags stocked.
5. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2020
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Annually
6. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
7. Rationale for choosing BMP and setting measurable goal(s): Columbia County has three waterbodies impaired for fecal coliform and a booming dog population. This activity will reduce the pet waste discharged into our streams.
8. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP will be determined by the number of pet waste bags replaced annually.

Minimum Control Measure #3

Illicit Discharge Detection and Elimination

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

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

A. Ordinance/Regulatory Mechanism Evaluation

1. Does the MS4 have an ordinance or regulatory mechanism that effectively prohibits illicit discharges? Yes X No _____

If yes, date of adoption: March 10, 2003

Submit a copy as an addendum to this form. Ordinance in Appendix A

If no, see item #2.

2. If an evaluation of the ordinance/regulatory mechanism indicates that the ordinance/regulatory mechanism will require revision, then a copy of the adopted ordinance must be submitted with that year's annual report.

Ordinance adoption date: _____

Date for submittal to EPD: _____

B. Storm Sewer Map

1. Does the MS4 have a completed inventory and storm sewer map showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls?

Yes X No _____

If yes, submit the inventory and storm sewer system map as an addendum to this form.

If no, see item #2.

2. If the inventory and storm sewer system map must be developed, provide a schedule for completion. Final completion date/date for submittal to EPD must not exceed February 15, 2014.

MCM 3: Illicit Discharge Detection and Elimination

Best Management Practice (BMP) #1

1. Description of BMP: Legal Authority. The Columbia County Code of Ordinances Section 34-148 prohibits non-stormwater discharges to the County's Municipal Separate Storm Sewer System (MS4) and Section 34-149 prohibits illicit connections to the County's MS4. Each year these ordinances will be reviewed to determine if changes are necessary to keep the County current with state and federal rules and regulations.
2. Measurable Goal(s):
 - Review the Columbia County Code of Ordinances Sections 34-148 and 34-149 annually.
 - The County will revise the Ordinances when reviews deem it necessary.
3. Documentation to be submitted with each annual report:
 - A copy of the Ordinance or a copy of the revised Ordinance.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2003
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Annually
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Reviewing the ordinance on a regular basis and comparing it to state and federal regulations will ensure that the County has the legal authority to enforce the provisions of its Stormwater Management Plan.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the reduction in the number of illicit charges prohibited by the authority of this ordinance.

MCM 3: Illicit Discharge Detection and Elimination

Best Management Practice (BMP) #2

1. Description of BMP: Outfall map and inventory. Columbia County has a comprehensive procedure in place for maintaining an inventory of the County's stormwater assets. The resulting map contains all stormwater infrastructure data, including outfalls and receiving streams.
2. Measurable Goal(s):
 - Update the existing Columbia County MS4 outfall map and inventory as outfalls are developed in new construction and development projects.
3. Documentation to be submitted with each annual report:
 - A current copy of the outfall map and inventory.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2003
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Annually
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Mapping the outfalls will allow a means of locating potential non-point source pollution sources and facilitate the tracking of illicit discharges and the operation and maintenance of the County's MS4.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by determining if the outfall map assists in the detection and elimination of illicit connections and prohibited discharges.

MCM 3: Illicit Discharge Detection and Elimination

Best Management Practice (BMP) #3

1. Description of BMP: Illicit Discharge Detection and Elimination (IDDE) Plan.
Columbia County will enforce a program to detect and eliminate illicit discharges. The IDDE Plan consists of the following components: dry weather screening (DWS) of MS4 outfalls, investigation of potential illicit discharges, and elimination of illicit discharges.
2. Measurable Goal(s):
 - Conduct DWS and inspections of the County's MS4 outfalls each year following procedures prescribed in the IDDE Standard Operating Guidelines so that 100% of the outfalls are inspected within the permit period.
 - At a minimum, 5% of the outfalls will be inspected annually.
 - Implement investigative and elimination procedures outlined in the SOG when the results of a DWS of an outfall indicate a potential for an illicit discharge.
 - Follow enforcement procedures described in the Columbia County MS4 Enforcement Response Plan for applicable illicit discharges discovered during DWS.
3. Documentation to be submitted with each annual report:
 - A copy of the IDDE Plan.
 - Copies of the DWS forms to include source-tracking information on all screenings found to have flow.
4. Schedule:

a. <u>Interim Milestone Dates (if applicable)</u> :	N/A
b. <u>Implementation Date (if applicable)</u> :	2003
c. <u>Frequency of actions (if applicable)</u> :	Annually
d. <u>Month/Year of each action (if applicable)</u> :	Annually
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Elimination of illicit discharges will reduce the amount of pollutants discharged to surface waterbodies in Columbia County.

7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of illicit discharges discovered and resolved during dry weather screenings.

MCM 3: Illicit Discharge Detection and Elimination

Best Management Practice (BMP) #4

1. Description of BMP: Education. Education on the impacts of illicit discharges and illicit connections is key. On the County website, we discuss the difference between a sanitary sewer and storm sewer, stormwater pollution, pollution prevention, and how everyone can improve stormwater quality.
2. Measurable Goal(s):
 - Review the webpages annually and update as needed.
3. Documentation to be submitted with each annual report:
 - The number of hits to the pollution prevention webpage.
 - Screenshots of updates made to this page during the reporting period.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2003
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Annually
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Providing everyone information about pollution prevention will enable the County to work towards eliminating them.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by tracking the number of hits to this webpage.

MCM 3: Illicit Discharge Detection and Elimination

Best Management Practice (BMP) #5

1. Description of BMP: Complaint Response. Columbia County's procedures for receiving, investigating, and tracking the status of illicit discharge complaints are contained in the Columbia County Illicit Discharge Detection and Elimination (IDDE) Standard Operating Guidelines. Complaints that do not fall under the IDDE SOG will be investigated and resolved by the construction group (and reported in MCM 4 BMP 5) or the Environmental Compliance Department (and reported with this BMP).
2. Measurable Goal(s):
 - Implement complaint response procedures established in the IDDE SOG.
 - The County will respond to complaints within three business days.
3. Documentation to be submitted with each annual report:
 - A copy of the complaints received, including the complainant's name, complaint date, and type of complaint, in addition to the resolution, along with a copy of any compliance or enforcement activities.
4. Schedule:

a. <u>Interim Milestone Dates (if applicable)</u> :	N/A
b. <u>Implementation Date (if applicable)</u> :	Ongoing
c. <u>Frequency of actions (if applicable)</u> :	Annually
d. <u>Month/Year of each action (if applicable)</u> :	Annually
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): A standard method for responding to IDDE complaints will expedite the elimination of illicit discharges, reducing the amount of pollutants discharged to surface water bodies in Columbia County.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this

BMP may be measured by the number of IDDE complaints received and the response time to them.

Minimum Control Measure #4

Construction Site Stormwater Runoff Control

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

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

A. Ordinance Evaluation

1. Does the MS4 have an ordinance which is adequate to require erosion and sediment controls at construction sites? Yes X No _____

If yes, date of adoption: February, 2004

Submit a copy as an addendum to this form. The ordinance is in Appendix A

If no, see item #4.

2. Does the ordinance include sanctions for failure to comply with erosion and sediment control requirements? Yes X No _____

If no, see item #4.

3. Does the ordinance require construction site operators to control waste at the construction site? Yes X No _____

If no, see item #4.

4. If an evaluation of the ordinance must be completed, or the MS4 is aware that the ordinance will require revision, then adoption must be completed. If the ordinance will be revised, then a copy of the adopted ordinance must be submitted with that year's annual report.

Final completion date: _____

Date for submittal to EPD: _____

MCM 4: Construction Site Stormwater Runoff Control

Best Management Practice (BMP) #1

1. Description of BMP: Legal Authority. The Columbia County Code of Ordinances Section 34 Article III addresses soil erosion and sedimentation as well as construction waste. Each year this ordinance will be reviewed to determine if changes are necessary to keep the County current with state and federal rules and regulations.
2. Measurable Goal(s):
 - Review the Columbia County Code of Ordinances Section 34 Article III annually.
 - The County will revise the ordinance when necessary.
3. Documentation to be submitted with each annual report:
 - A copy of the ordinance if it was changed during the reporting year.
4. Schedule:

a. <u>Interim Milestone Dates (if applicable)</u> :	N/A
b. <u>Implementation Date (if applicable)</u> :	2000
c. <u>Frequency of actions (if applicable)</u> :	Annually
d. <u>Month/Year of each action (if applicable)</u> :	Annually
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Reviewing the ordinance on a regular basis and comparing it to state and federal regulations will ensure that the County has the legal authority to enforce the provisions of its Stormwater Management Plan.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the reduction in the number of Stop Work Order Erosion & Sediment Control violations.

MCM 4: Construction Site Stormwater Runoff Control

Best Management Practice (BMP) #2

1. Description of BMP: Site Plan Review Procedures. Columbia County reviews site plans for construction projects according to provisions in the County's Memorandum of Authorization to ensure they conform to applicable rules, ordinances, and regulations. For these plan reviews, the current Georgia Soil and Water Conservation Commission (GSWCC) ES&PC plan review checklists will be used. The Memorandum of Authorization is included.
2. Measurable Goal(s):
 - Implement the Site Plan Review Procedures contained in Columbia County's Memorandum of Authorization.
 - Use the GSWCC checklists on ES&PC plan reviews.
3. Documentation to be submitted with each annual report:
 - A list of the site plans received and the number of site plans reviewed, approved, or denied during the reporting period.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2007
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Reviewing site plans will enable the County to prevent construction that may harm the environment and does not comply with applicable rules, ordinances, and regulations.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number site plans that are denied for not complying with applicable rules, ordinances, and regulations.

MCM 4: Construction Site Stormwater Runoff Control

Best Management Practice (BMP) #3

1. Description of BMP: Inspection Program. Inspections of all construction sites are conducted on a continuing basis until final stabilization. Residential, commercial, and subdivision developments are required to implement erosion control BMPs that have been approved by the Engineering Services Division during the site plan review and permitting process. Inspections are documented electronically using Munis. The Construction Site Inspection Procedures are included.
2. Measurable Goal(s):
 - Implement the Construction Site Inspection Procedures.
 - Inspect sites following permit issuance and throughout construction until final stabilization.
3. Documentation to be submitted with each annual report:
 - A list of active construction sites and any inspections conducted during the reporting period.
 - A copy of the inspection template from Munis.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Inspection of developing properties within Columbia County will allow the County to enforce needed soil erosion best management practices and water quality BMPs.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of enforcement actions taken.

MCM 4: Construction Site Stormwater Runoff Control

Best Management Practice (BMP) #4

1. Description of BMP: Enforcement Procedures. Inspections of all construction sites are conducted on a continuing basis until final stabilization. Residential, commercial, and subdivision developments are required to implement erosion control BMPs that have been approved by the Engineering Services Division during the site plan review and permitting process. If, during inspections conducted according to the Inspection Program Procedures, it is determined that a site is not in compliance with the County's Erosion and Sediment Control ordinance, enforcement will be initiated according to procedures delineated in the Columbia County MS4 Enforcement Response Plan (ERP). The ERP is included.
2. Measurable Goal(s):
 - Ensure enforcement action and resolution is taken for 100% of identified violations.
3. Documentation to be submitted with each annual report:
 - Documentation of any enforcement actions taken during the reporting period, including the number and type (e.g. Notice of Violation, Stop Work Order) and status (e.g. pending, resolved).
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Escalating enforcement against E&S violators should result in compliance with E&S rules and regulations, which should result in fewer pollutants entering the MS4.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of enforcement actions.

MCM 4: Construction Site Stormwater Runoff Control

Best Management Practice (BMP) #5

1. Description of BMP: E&S Complaint Response Procedures. Columbia County's Government Information & Service Center (a.k.a. 311) provides a means of receiving complaints pertaining to construction site soil erosion and sediment control from the public. In general, citizen complaints are taken over the phone or email. Once a complaint has been made, a complaint identification number is issued and the complainant's contact information and a description of the problem are entered into the 311 Complaint Database, Cityworks. The complaint is then forwarded to the attention of an inspector. The inspector will address the issue and follow-up with the complainant if they provided their contact information. Then the inspector will provide details of resolution to the office to formally close-out the complaint in Cityworks. Members of the general public can report complaints by dialing 3-1-1, 706-855-7246, or visiting the website at <https://www.columbiacountyga.gov/county/311-info-help>

2. Measurable Goal(s):
 - Implement the E&S Complaint Response Procedures.
 - Provide information on complaints handled during the reporting period.
 - The County will respond to complaints within five business days.

3. Documentation to be submitted with each annual report:
 - A copy of the complaints received, including the complainant's name, complaint date, type of complaint, and the resolution, along with a copy of any compliance and enforcement activities.

4. Schedule:

a. <u>Interim Milestone Dates (if applicable)</u> :	N/A
b. <u>Implementation Date (if applicable)</u> :	Ongoing
c. <u>Frequency of actions (if applicable)</u> :	Annually
d. <u>Month/Year of each action (if applicable)</u> :	N/A

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

6. Rationale for choosing BMP and setting measurable goal(s): Developing and implementing formal E&S Complaint Response Procedures ensures that complaints are handled in a timely and consistent manner.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by determining how many complaints lead to correction of E&S violations.

MCM 4: Construction Site Stormwater Runoff Control

Best Management Practice (BMP) #6

1. Description of BMP: Certification. All MS4 staff involved in construction activities subject to the Construction General Permits either are or will be trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission.
2. Measurable Goal(s):
 - Have all MS4 personnel involved in construction activities subject to the Construction General Permits trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission.
 - Get new employees certified within 6-months of hire.
3. Documentation to be submitted with each annual report:
 - A list of the number and type of current certifications held by MS4 staff.
 - Screenshot documentation of staff certifications on the Georgia Soil and Water Conservation Commission website.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Training and certification of MS4 personnel involved in construction activities subject to the Construction General Permits will result in a more knowledgeable staff and effective implementation of regulation.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the levels of certifications held by MS4 staff.

Minimum Control Measure # 5

**Post-Construction Stormwater Management in
New Development and Redevelopment**

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

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

A. Stormwater Design Manual

1. Has the MS4 adopted the Georgia Stormwater Management Manual?
Yes No

If yes, provide the date of adoption: August 5, 2014
Submit a copy of the adopted ordinance or resolution as an addendum to this form.

If the MS4 is located within the 11-county coastal management program service area, has adoption of the Coastal Stormwater Supplement been completed?
Yes No N/A

If yes, provide the date of adoption: _____

If no, see item #2.

2. Has the MS4 adopted a local design manual in place of the Georgia Stormwater Management Manual?
Yes Supplement to the GSMM No

If yes, provide the date of adoption: July 7, 2015

If no, see item #3.

3. If adoption of the Georgia Stormwater Management Manual, a local design manual, or the Coastal Stormwater Supplement has not yet occurred, then adoption must be completed. A copy of the adopted ordinance must be submitted with that year's annual report.

Final completion date: _____

Date of submittal to EPD: _____

B. Inventory of Post-Construction Storm Water Management Structures

1. Does the MS4 have a completed inventory of all publicly-owned post-construction storm water structures and those privately-owned structures designed after December 9, 2008?

Yes X No _____

If yes, submit the inventory as an addendum to this form.

If no, see item #2.

2. If the inventory is not complete, then provide a schedule for completion.

C. Post-Construction Ordinance Evaluation

1. Does the MS4 have an ordinance that effectively controls runoff from new development or redevelopment sites?

Yes X No _____

If yes, submit a copy as an addendum to this form.

If no, see item #2.

2. If an evaluation of the ordinance must be completed, or the MS4 is aware that the ordinance will require revision, adoption must be completed by no later than one year from the date of designation and submitted with that year's annual report.

Final completion date: _____

Date of submittal to EPD: _____

D. Green Infrastructure/Low Impact Development (GI/LID)

1. If the population is less than 10,000, then no action is required.
2. If the population exceeds 10,000, then the MS4 must review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID.

- i. An evaluation of the regulatory mechanisms must be performed. Provide a schedule for completing the evaluation:
- ii. The evaluation must be completed by no later than 2 years following permit issuance and submitted by February 15, 2015.

Final completion date: April 15, 2015
Date of submittal to EPD: April 15, 2015

- iii. Any necessary ordinance revisions must be completed and adopted ordinances submitted to EPD within 4 years of permit issuance and submitted to EPD by February 15, 2017.

Final completion date/date of submittal to EPD: April 15, 2015

- 3. Does the MS4 have a completed inventory of water quality-related GI/LID structures located within the permitted area and at a minimum, constructed after the effective date of the permit?
Yes X No _____

If yes, submit the inventory as an addendum to this form.

If no, see item #4.

- 4. If the inventory is not complete, then provide a schedule for completion. The inventory must be submitted by February 15, 2015.

MCM 5: Post-Construction Stormwater Management

Best Management Practice (BMP) #1

1. Description of BMP: Legal Authority. The Columbia County Code of Ordinances Section 34 Article IV addresses post-construction stormwater management. Additionally, the County has adopted the Georgia Stormwater Management Manual (GSMM) and the Columbia County Supplement (Supplement) to the GSMM. This Article and the Supplement will be reviewed to determine if changes are necessary to keep the County current with state and federal rules and regulations.
2. Measurable Goal(s):
 - Review the Columbia County Code of Ordinances Section 34-IV and Supplement annually.
 - The County will revise the ordinance and Supplement when necessary.
3. Documentation to be submitted with each annual report:
 - If the ordinance and/or Supplement is revised during the reporting period a copy of the adopted ordinance and/or Supplement will be submitted.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2000
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Reviewing the ordinance and Supplement on a regular basis and comparing it to state and federal regulations will ensure that the County has the legal authority to enforce the provisions of its Stormwater Management Plan.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this

BMP may be measured by noting the number of plans that require stormwater runoff quality measures.

MCM 5: Post-Construction Stormwater Management

Best Management Practice (BMP) #2

1. Description of BMP: Post-Construction Stormwater Management Structure Inventory. Columbia County has developed a comprehensive procedure for inventorying all of the County's storm water assets within the delineated storm water service area, which includes the 2010 census urbanized area. This inventory includes publically-owned post-construction storm water management structures (to include detention ponds, retention ponds and water quality structures) and privately-owned structures designed after December 9, 2008.

In order to inventory the County's stormwater assets within the delineated stormwater service area the County developed a comprehensive procedure through as-built surveys of developments. The as-built surveys show all County owned and private assets, including stormwater infrastructure. Once accepted, the survey is sent to the County GIS department and field crews collect data on the infrastructure, including outfalls, and import this information into a geodatabase. This map and inventory will be updated as new structures are added to the system as outlined in the County's Illicit Discharge Detection and Elimination Standard Operating Guidelines.

2. Measurable Goal(s):
 - Develop an inventory of the public detention ponds, retention ponds, and water quality structures.
 - Develop an inventory of all privately-owned detention ponds, retention ponds, and water quality structures designed after December 9, 2008.
 - Provide an updated inventory of post-construction stormwater management structures with each Annual Report.
3. Documentation to be provided with each annual report:
 - A revised inventory, including any additional "added" structures or identified existing ones.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually

- d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): An inventory of stormwater detention ponds throughout the County will provide a means of keeping track of all detention and retention facilities and their current maintenance status.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of structures that are added each year.

MCM 5: Post Construction Stormwater Management

Best Management Practice (BMP) #3

1. Description of BMP: Inspection Program – Post-Construction Stormwater Management Structures. Columbia County has an inventory of post-construction stormwater management structures and 100% of the structures will be inspected within the permit period. At a minimum, 5% of the structures will be inspected annually. The inspections will be conducted in accordance with the procedures outlined in the County’s Operations and Maintenance SOP, the Georgia Storm Water Management Manual, and the Columbia County Supplement. The inspections will be documented electronically in Cityworks.
2. Measurable Goal(s):
 - Annually inspect at least 5% of the post-construction stormwater management structures located in the permit coverage area so that 100% of the structures are inspected within the permit period.
3. Documentation to be submitted with each annual report:
 - A report of the post-construction stormwater management structure inspections conducted during the reporting period. The report will contain the total number and percentage of structures inspected.
 - A copy of the inspection form.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Conducting inspection of post-construction stormwater management structures will assist the County in determining which structures are in need of major maintenance.

7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of structures that are inspected each year.

MCM 5: Post Construction Stormwater Management

Best Management Practice (BMP) #4

1. Description of BMP: Maintenance Program Post-Construction Stormwater Management Structures. Columbia County has an inventory of post-construction stormwater management structures. The County will operate and maintain the permittee-owned structures included on the inventory according to the maintenance schedules outlined in the County's Stormwater Operation and Maintenance SOG and the Georgia Storm Water Management Manual. For publically-owned structures owned by other entities and privately-owned structures whose construction is completed after December 6, 2012, maintenance will be performed by the owner/operator and the County will require a maintenance agreement. The County will retain copies of all maintenance agreements.

2. Measurable Goal(s):
 - Maintain permittee-owned detention ponds, retention ponds, and water quality structures according to the maintenance schedules outlined in the County's Stormwater Operation and Maintenance SOG and the Georgia Storm Water Management Manual.
 - Obtain maintenance agreements outlining the owner's responsibilities for privately-owned structures included in the inventory developed in BMP #2.

3. Documentation to be submitted with each annual report:
 - A master work order spreadsheet of structures maintained and the type of maintenance performed.
 - A summary of the maintenance agreements executed with the owners/operators of privately owned post-construction stormwater management that includes the total number of executed maintenance agreements.
 - A copy of the maintenance agreement for privately owned structures.
 - Copies of the inspection reports and corresponding letters sent to the property owner for private ponds inspected on the inventory in BMP #2. These letters will detail what, if any, maintenance is needed on the structure.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A

 - b. Implementation Date (if applicable): Ongoing

 - c. Frequency of actions (if applicable): Ongoing

- d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Conducting maintenance on post-construction stormwater management structures will ensure that they work properly and reduce the amount of pollutants discharged to surface waters.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of structures that are maintained each year.

MCM 5: Post Construction Stormwater Management

Best Management Practice (BMP) #5

1. Description of BMP: GI/LID Structure Inventory. Columbia County will develop and maintain an inventory of water quality related GI/LID structures, including bioswales, pervious pavement, rain gardens, cisterns, and green roofs, within the delineated stormwater utility area. The inventory will be updated as new structures are completed or existing structures are identified. The inventory will also include a total of each type of structure.
2. Measurable Goal(s):
 - Develop an inventory of water quality related GI/LID structures constructed on or after December 6, 2012, to be submitted with the annual report.
 - Track the addition of new water quality related GI/LID structures through the plan review process and ensure the structures are added to the inventory.
3. Documentation to be submitted with each annual report:
 - An updated inventory, including those structures added during the reporting period.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): 4/15/2015
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Tracking GI/LID structures will enable the County to know how often the new technology is being used.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of GI/LID structures that are constructed in the County each year.

MCM 5: Post Construction Stormwater Management

Best Management Practice (BMP) #6

1. Description of BMP: GI/LID Program. The County will develop and implement a GI/LID program. Program components include procedures for evaluating the feasibility of different GI/LID techniques and practices, allowable GI/LID structures, and procedures for inspection and maintenance based on ownership.
2. Measurable Goal(s):
 - Implement the GI/LID Program to ensure that all applicable new development and redevelopment projects adhere to it.
 - Evaluate all applicable new development and redevelopment projects for compliance with the program.
3. Documentation to be submitted with each annual report:
 - A copy of the GI/LID Program.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2020
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Incorporation of GI/LID practices will improve the quality and quantity of stormwater.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of GI/LID structures that are approved.

MCM 5: Post Construction Stormwater Management

Best Management Practice (BMP) #7

1. Description of BMP: GI/LID Inspection and Maintenance Program. The County will conduct and/or ensure inspections are conducted on 100% of the GI/LID structures on the inventory in BMP #5 within a 5-year period. The County will operate and maintain permittee-owned structures included on the inventory according to the County's Operation and Maintenance SOG and the Georgia Stormwater Management Manual. For publically-owned structures owned by other entities and privately-owned non-residential structures, maintenance will be performed by the owner/operator and the County will require a maintenance agreement. The County will retain copies of all maintenance agreements.

2. Measurable Goal(s):
 - Maintain permittee-owned GI/LID structures according to the maintenance schedules outlined in the County's Stormwater Operation and Maintenance SOG and the Georgia Storm Water Management Manual.
 - Obtain maintenance agreements outlining the owner's responsibilities for publically-owned structures owned by other entities and privately-owned non-residential structures included in the inventory developed in BMP #5.

3. Documentation to be submitted with each annual report:
 - A master work order spreadsheet of structures inspected.
 - A master work order spreadsheet of structures maintained and the type of maintenance performed.
 - A summary of the maintenance agreements executed with the owners/operators of publically-owned structures owned by other entities and privately-owned non-residential structures.
 - A copy of the maintenance agreement for privately-owned structures.
 - Copies of the inspection reports and corresponding letters sent to the property owner for private structures and/or publically-owned structures owned by other entities inspected on the inventory in BMP #5. These letters will detail what, if any, maintenance is needed on the structure.

4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A

 - b. Implementation Date (if applicable): 2020

 - c. Frequency of actions (if applicable): Ongoing

 - d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Conducting maintenance on post-construction GI/LID stormwater management structures will ensure that they work properly and reduce the amount of pollutants discharged to surface waters.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of structures that are maintained each year.

Minimum Control Measure #6

Pollution Prevention/ Good Housekeeping for Municipal Operations

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

MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations

Best Management Practice (BMP) #1

1. Description of BMP: MS4 Control Structure Inventory and Map. A map and inventory of all MS4 components within the permit coverage area to include catch basins, ditches, storm drain pipes and detention/retention ponds has been created and will continue to be updated.

In order to inventory the County's stormwater assets within the delineated stormwater service area (which includes the Urbanized Area) the County developed a comprehensive procedure through as-built surveys of developments. The as-built surveys show all County owned and private assets, including stormwater infrastructure. Once accepted, the survey is sent to the County GIS department and field crews collect data on the infrastructure, including outfalls, and import this information into a geodatabase.

This map and inventory will be updated as new structures are added to the system as outlined in the County's Illicit Discharge Detection and Elimination Standard Operating Guidelines.

The County will assess whether the Urbanized Area, as delineated in the 2010 Census, has changed, and whether the inventory and map must be revised to accommodate the new Urbanized Area.

2. Measurable Goal(s):
 - Update the inventory and map as necessary to ensure the Urbanized Area is included.
3. Documentation to be provided in each annual report:
 - An updated map and inventory, and the number of structures added during the reporting period and the total number of structures.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): N/A
 - c. Frequency of actions (if applicable): Ongoing

- d. Month/Year of each action (if applicable): Annually
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager
6. Rationale for choosing BMP and setting measurable goal(s): Maintaining a map and inventory of the MS4 components gives County personnel a more precise location of the MS4 components for inspection and maintenance purposes.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by determining the number of structures added to the inventory each year.

MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations

Best Management Practice (BMP) #2

1. Description of BMP: MS4 Inspection Program. The inspection of MS4 control structures (catch basins, detention/retention ponds, ditches, and storm drain pipes) within the County's Urbanized Area to address stormwater quantity and quality concerns is done on a scheduled route as well as on a complaint basis. The County will inspect catch basins, detention/retention ponds, ditches, and storm drain pipes, as outlined in the County's Operation and Maintenance SOP.
2. Measurable Goal(s):
 - Annually inspect at least 5% of the MS4 control structures (catch basins, detention/retention ponds, ditches, and storm drain pipes) located in the permit coverage area so that 100% of the structures are inspected within the 5-year permit term.
3. Documentation to be submitted with each annual report:
 - Provide a master spreadsheet report of the structures inspected during the reporting period.
 - Provide the number and percentage of structures inspected during the reporting period.
 - A copy of the most recent Operations and Maintenance SOG.
 - Any documentation of compliance and enforcement activities.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager

6. Rationale for choosing BMP and setting measurable goal(s): Inspection of MS4 control structures will provide the County a means of determining which structures are in need of maintenance.

7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be determined by determining how many control structures need to be maintained each year.

MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations

Best Management Practice (BMP) #3

1. Description of BMP: MS4 Maintenance Program – MS4 Control Structures.
Maintenance is performed on MS4 control structures within the County’s Permit Coverage Area when inspections indicate it is necessary. The County will maintain the MS4 control structures (catch basins, ditches, detention/retention ponds, and storm drain lines), according to the maintenance schedules outlined in the County’s Operation and Maintenance SOP and the Georgia Storm Water Management Manual. For more information on the MS4 Maintenance Program see Post-Construction Stormwater Management BMP #4.
2. Measurable Goal(s):
 - Conduct required maintenance for MS4 control structures located in the Permit Coverage Area each year as needed.
3. Documentation to be submitted with each annual report:
 - A list of structures maintained and the type of maintenance performed, including documentation of maintenance activities performed during the reporting period.
 - A total of the number of each type of structure maintained during the reporting period.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Conducting maintenance on MS4 control structures will ensure that they work properly and reduce the amount of pollutants discharged to surface waters.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this

BMP may be measured by noting the number of structures that are maintained each year.

MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations

Best Management Practice (BMP) #4

1. Description of BMP: Street and Parking Lot Cleaning. Street sweeping is conducted based on work orders, which are primarily generated from complaints. Street sweeping and litter control procedures are completed in accordance with the County's Operation and Maintenance SOG. Street sweeping and consequential litter disposal are documented electronically using the Cityworks system.

Pursuant to The Rules of the Department of Natural Resources Chapter 391-3-30.-07 street sweeping will not be conducted when the Director of the Environmental Protection Division declares a state of drought, specifically Drought Response Level 2 or 3, for our County.

2. Measurable Goal(s):
 - A minimum of 1 mile of streets will be swept each year according to the procedure above.
3. Documentation to be submitted with each annual report:
 - A list of the areas and the length of streets that were swept.
 - The amount of litter and debris gathered and disposed of in a permitted landfill from street sweeping activities.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Cleaning of streets will reduce the amount of contaminants washed into surface waters.

7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be determined by noting the number of miles swept each year.

MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations

Best Management Practice (BMP) #5

1. Description of BMP: Employee Training. A training program has been instituted for County employees. The training will include topics such as good housekeeping at municipal facilities, illicit discharge detection, construction site inspection, and green infrastructure. Training will be conducted at least once a year.
2. Measurable Goal(s):
 - Train applicable employees annually on good housekeeping, illicit discharge detection, construction site inspection, and green infrastructure.
3. Documentation to be submitted with each annual report:
 - Documentation of training materials used.
 - Sign-in sheets from the training.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Training County employees the proper methods will help facilitate good housekeeping practices and other desirable products for MS4 compliance.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be determined by counting the number of employees trained each year.

MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations

Best Management Practice (BMP) #6

1. Description of BMP: Waste Disposal. To ensure the proper disposal of waste collected from street sweeping and vac-truck operations, waste removed from the MS4 will be disposed of according to the County's Operations and Maintenance SOP.
2. Measurable Goal(s):
 - 100% of the waste removed from the MS4 will be disposed of properly in a permitted local landfill.
3. Documentation to be submitted with each annual report:
 - Waste receipts of the waste taken to a local permitted facility.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): NA
 - b. Implementation Date (if applicable): January 2014
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): Ongoing
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Collecting waste using the street sweeper and vac-truck will help prevent waste from entering state waters.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be determined by measuring the amount of debris collected.

MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations

Best Management Practice (BMP) #7

1. Description of BMP: New Flood Management Projects. New flood management projects, e.g., detention and retention ponds, are evaluated to see if storm water quality BMPs can be incorporated into the overall design.
2. Measurable Goal(s):
 - Assess 100% of proposed flood management projects for water quality impacts during the design phase.
3. Documentation to be submitted with each annual report:
 - The number of plans reviewed where flood management projects were assessed for water quality impacts during the reporting period.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Ongoing
 - d. Month/Year of each action (if applicable): Ongoing
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Incorporation of new water quality measures into proposed flood control projects would reduce the quantity of pollutants discharging to surface waters.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number of proposed flood management projects reviewed.

MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations

Best Management Practice (BMP) #8

1. Description of BMP: Existing Flood Management Projects or Structures. Existing County owned flood management control structures (detention/retention ponds and the components of the County's stormwater drainage systems) will be evaluated for possible retrofits. Due to the large number of control structures already identified (see inventory for MCM #6 BMP #1), those structures that have exhibited downstream water quality impacts, are located in proximity to 303(d) listed streams, or have been identified by citizen complaints/County personnel as needing maintenance will be priority. Projects will be selected and completed within budget. At a minimum, at least one project will be assessed annually using the Water Quality Improvement Worksheet.
2. Measurable Goal(s):
 - Conduct an assessment of at least one existing County owned flood management projects or structures annually for potential retrofitting to address water quality impacts.
3. Documentation to be submitted with each annual report:
 - Provide a copy of the completed Water Quality Improvement Worksheet for any assessment and/or retrofitting assessments conducted during the reporting period.
 - Provide documentation of any retrofitting activities conducted.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): N/A
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): N/A
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.

6. Rationale for choosing BMP and setting measurable goal(s): Incorporation of new water quality measures into existing structures would reduce the quantity of pollutants discharging to surface waters.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be measured by noting the number existing structures that are retrofitted.

MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations

Best Management Practice (BMP) #9

1. Description of BMP: Municipal facilities. The County has developed an inventory of the municipal facilities that have the potential to cause pollution, and the County will update this inventory as new structures are added.
2. Measurable Goal(s):
 - Conduct inspections on the facilities in the inventory, with a minimum of 5% annually, so that all facilities are inspected within the 5-year permit period.
3. Documentation to be submitted with each annual report:
 - The most current version of the inventory.
 - The inspection form utilized during the inspection.
4. Schedule:
 - a. Interim Milestone Dates (if applicable): N/A
 - b. Implementation Date (if applicable): 2014
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Ongoing
5. Person (position) responsible for overall management and implementation of the BMP: Project Manager.
6. Rationale for choosing BMP and setting measurable goal(s): Having an inventory and inspection schedule for municipal facilities will facilitate the prevention of pollution to receiving waters.
7. How will you determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit? The effectiveness of this BMP may be determined by noting the number of facilities that are inspected each year.

Columbia County Stormwater Utility Department TMDL Monitoring and Implementation Plan

December 10, 2019

Contact Information

Organization: Columbia County Stormwater Utility Department
 Official EPD Liaison: Katie Beth Jennings, Environmental Services Manager
 Mailing address: P.O. Box 498, Evans, GA 30809
 Telephone: 706-447-6700
 Fax Number: 706-868-4226
 Email: KJennings@columbiacountyga.gov

Part I: Introduction

The purpose of this plan is to monitor any impaired waters located within the permit coverage area, per the latest approved 305(b)/303(d) List of Waters, which contain MS4 outfalls or are within one linear mile downstream of MS4 outfalls.

305(b)/303(d) Listed Stream Segments. There are three segments on the 2018 305(b)/303(d) list in Columbia County. The stream name, reach, evaluation, use, criterion violated, and extent are listed in the following table:

<u>Name</u>	<u>Reach</u>	<u>Evaluation</u>	<u>Use</u>	<u>Criterion Violated</u>	<u>Extent</u>
Jones Creek	Tributary to Savannah River near Evans	Not Supporting	Fishing	Fecal Coliform	3 miles
Reed Creek	Rd S1727 to Bowen Pond	Not Supporting	Fishing	Fecal Coliform	8 miles
Uchee Creek	Tudor Branch to upstream Little River near Evans	Not Supporting	Fishing	Fecal Coliform	3 miles

All waters are located in the Middle Savannah River drainage basin. Jones Creek and Uchee Creek discharge to the Savannah River while Reed Creek discharges to the Augusta Canal, which eventually rejoins the Savannah River. Columbia County will check annually to ensure all impaired waters within our permit coverage area are included on this Plan.

Part II: TMDL Monitoring

- A. Sampling locations.** Six sampling sites were chosen by County. Each site is described below.
1. RC03 (Reed Creek at Foxfire). Reed Creek site one is located at the intersection of Reed Creek and Foxfire Place in West Lake subdivision. This site was chosen because it as far downstream as possible in the urbanized area but is upstream of Bowen Pond.
 2. RC04 (Reed Creek at The Pass). The second Reed Creek site is located where Reed Creek runs adjacent to The Pass. This site is below the confluence of three major tributaries.
 3. RC05 (Reed Creek at Stonington). Reed Creek at Stonington represent one of the major tributaries in the upper reaches of Reed Creek.
 4. JC04 This Jones Creek site is near the Jones Creek lift station east of Furys Ferry Road. This site was chosen because it is in a wadeable section of the Creek and downstream of most of the urbanization.
 - i. JC04 ALT. In the event of severe drought, when there is no water flowing at JC04, the County will sample the third major tributary of Jones Creek upstream of the pond.
 5. JC05 Major Jones Creek tributary at Southern Pines Drive.
 6. EC01 (Uchee Creek at Knob Hill). Uchee Creek at Knob Hill was chosen because it is in a developing area of the County.
- B. Map.** The impaired waters, sampling locations, and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of these waters are shown on the attached map.
- C. Sampling Procedures.** Grab samples shall be collected at each site from the sub-surface in the creek and at least 18 inches from the bank in a location where the water is flowing.
- D. Methodology.** All samples will be analyzed according to procedures specified in 40 CFR 136. Also the County will adhere to the preservation techniques and holding times prescribed in 40 CFR 136.
- E. Sampling Schedule.** For the fecal coliform bacteria samples, four grab samples will be collected on a weekly basis during the second month of each quarter, quarters being defined as January – March, April – June, July – September, and October – December. Collecting samples the second month of each quarter will insure that two of the four geometric means that are calculated fall in the May-October timeframe.
- F. Detection Limit.** The detection limit for Fecal Coliform Bacteria is <1 CFU/100 ml.

- G. Proposed BMPs to Limit POCs.** Public Education and Outreach. Information explaining the importance of picking up after pets and corresponding water quality impacts will be incorporated into the SWMP using three BMPs, MCM #1 BMP #1, Ongoing Social Media Program; MCM #1 BMP #3, Educate 5th graders; and MCM #2 BMP #4, Pet Waste Stations.
- H. Schedule to Implement BMPs to Limit POCs.** MCM #1 BMP #1, Ongoing Social Media Program, and MCM #1 BMP #3, Educate 5th Graders, are both underway. MCM #2 BMP #4, Pet Waste Stations, will commence in 2020.
- I. Information to include in each Annual Report.** Each Annual Report will include monitoring data collected during the reporting period and an assessment of data for each POC. POC data assessments will include a baseline characterization, observations with regard to trends over time, and an evaluation of whether water quality is improving, declining, fluctuating, or remaining constant. Each Annual Report will also include an assessment on the effectiveness of the BMPs utilized for the POC and feedback on if additional measures are necessary. If additional BMPs or revised BMPs are deemed necessary, the Stormwater Management Plan will be updated and submitted to EPD for review.

Columbia County Enforcement Response Plan

The following Enforcement Response Plan will be used in the administration of Columbia County's Municipal Separate Storm Sewer System Monitoring and Compliance Program in order to provide consistent and timely use of enforcement actions to address violations. The County will identify violations by 1-investigating complaints, 2-conducting periodic inspections of MS4 facilities (permanent structural controls), and 3-conducting inspections as outlined in Section 34 of the Columbia County Code of Ordinances Erosion and Sediment Control Program. The Plan provides a range of responses, authorized by the Code of Ordinances, which are appropriate for various types of violations that might be encountered. It also establishes staff responsibilities.

When making determinations on the level of enforcement response, the County will consider the magnitude and duration of the violation, harm to the environment, previous actions taken against the violator, and the good faith of the violator.

Part 1. Types of Responses

There are three types of enforcement responses: informal, formal, and judicial. The informal and formal response varies by type of violation; illicit discharge elimination, illegal dumping, or construction site. All violations follow the same judicial procedures.

Informal - Informal may be a telephone contact, personal contact, or a notice of violation (NOV) when violations are non-significant or when the violator is cooperative in resolving the problem.

Formal – may be a Stop Work Order (SWO) when the violator does not properly respond to a NOV within the allotted time frame. A SWO can also be issued for certain violations like working without a permit, sediment discharge into state waters, and buffer disturbance in accordance with the Georgia Erosion and Sedimentation Act of 1975.

Judicial - civil or criminal prosecution when a violation is significant and/or the responsible party is uncooperative.

The enforcement process begins by identifying a violation. Once a violation is identified it must be determined whether the violation should be considered significant or non-significant. Next, the most appropriate response is determined. Each violation must be documented, even if the decision is to take no action. Documentation must explain why such action was/was not taken.

1. A. Criteria to Determine Type of Violation:

To determine if a violation is significant or non-significant the following criteria must be considered:

Magnitude. Generally, a minor isolated instance of non-compliance can be considered non-significant and dealt with by informal responses, such as a Personal Contact or Phone Conversation (PC) or notice of violation (NOV).

However, some isolated incidents may cause damage to the MS4 and/or the health and welfare of the public and County personnel. Situations like these would be significant and necessitate a formal enforcement action such as a Stop Work Order or an Administrative Order.

Duration. The site owner/operator will be subject to escalated enforcement actions if violations, regardless of severity, continue over prolonged periods of time. Chronic violations and/or failures to comply with administrative orders will be considered significant violations and may result in enforcement actions including, but not limited to, termination of permits, fines and/or court orders.

Effect on the Environment. One objective of Chapter 34 of the Columbia County Code of Ordinances is to prevent pollutants from entering the MS4 and/or entering a receiving water body and causing environmental harm. Environmental harm will be presumed whenever pollutants are directly discharged into an adjacent receiving water body or construction sites fail to implement BMPs that prevent sediment from leaving the site and entering the County's MS4. These violations will be considered significant.

Compliance History of the Operator. The compliance history will be an important factor in determining the appropriate remedy to apply. The County has the authority to issue informal notices for the less severe violation if the violator has a good compliance history.

Chronic compliance problems such as late reports and missing sample collections indicate a disdainful attitude and the possibility of future significant violations.

Good Faith of the Operator. "Good Faith" is defined as the owner/operators honest intention to remedy its non-compliance evidenced by actions which give support to this intention. Good faith shall be demonstrated by cooperation and completion of corrective measures in a timely manner. Compliance with a previous enforcement order is not in itself necessarily good faith.

The violator's good faith in correcting its noncompliance is a factor in determining which enforcement response is suitable. However, good faith does not eliminate the violator from enforcement action. For example, if the County must pay to install necessary Erosion and Sediment Control (ESC) measures, it should recover its costs regardless of prior good faith.

Once the severity of the violation is determined, it will then be necessary to initiate the proper response.

Part 2. Types of Violation

2. A. Illicit Discharge Detection and Elimination

Authority. The Columbia County Code of Ordinances Section 34-148 prohibits non-stormwater discharges to the County's Municipal Separate Storm Sewer System (MS4) and Section 34-149 prohibits illicit connections to the County's MS4.

2. A. 1. Illicit Discharge identified from Dry Weather Screening

The Columbia County IDDE SOG details investigation and elimination steps when an illicit discharge has

been confirmed. If the tracking investigation narrows but does not reveal the source, property owners are contacted within the defined boundary. The notification informs the property owners that a meeting will be necessary within a time frame determined by the Engineering Services Division Director. Appointments will be setup and if the source is identified the County will first pursue informal compliance methods. If people do not respond to the letters then citations may be issued. If no action from court, or if it is an emergency, then under the Illicit Discharge Ordinance the Stormwater Department can take corrective action.

2. A. 1.A. Informal. The County will document conversation of the issue with the following information: date and time of conversation, the person representing the illicit discharge source, and the substance of the conversation.

If the illicit discharge is not actively working toward correction within 30 days then formal compliance methods will be utilized.

2. A. 1.B. Formal. Formal methods will also be used when there is an immediate threat to human health and the environment.

Administrative Order. An administrative order (AO) will be a formal order issued by the County to violator in noncompliance.

There are three types of administrative orders:

Consent Order. The consent order will permit the flexibility of a negotiated settlement between the County and the violator. The order will be comprised of compliance schedules, stipulated fines, or other provisions as deemed necessary, and signatures of County and violator representatives.

The consent order will be used when the violator assumes responsibility for its noncompliance and is willing, in good faith, to correct its cause. The order should address all identified and potential deficiencies in the violator's compliance status.

The order shall not be an admission of liability or a plea of guilty. Additional enforcement actions may be pursued if the violator does not comply with all aspects of the consent order.

Cease and Desist Order. A cease and desist order shall be used in situations where the violator's discharge could result in significant environmental harm or impact human health, safety or welfare. A cease and desist order may be issued by telephone. A subsequent written order shall be served either in person or by registered mail to the violator. If the violator fails to comply with the order, the County may pursue additional steps to halt the discharge, such as, seeking injunctive relief or blocking by invoking police power.

Show Cause Order. An order to show cause directs the violator to appear before the County and explain why more severe enforcement actions should not be taken (e.g.: termination of service). A hearing will be conducted by a designated County representative (i.e. Attorney, County Division Director, a hearing officer) or by a review board.

The hearing may be formal or informal and it may be open or closed to the public.

The hearing shall determine if further action is warranted and, if so, its nature and extent.

2. A. 1. C. Judicial – see Part 3. Judicial.

2. B. *Illegal Dumping identified from a vehicular accident or complaint*

For spills resulting from accidental release following a vehicle accident, the Columbia County Environmental Compliance Department oversees start to finish cleanup. The company responsible for the release is also responsible for contracting a cleanup company to do the work. The Environmental Compliance Department remains onsite from initial response until cleanup activities are completed.

Illegal dumping can be reported through the citizen hotline, 311. The Environmental Compliance Department responds to these complaints and will ensure resolution. If a responsible party is not immediately evident County staff will interview contacts in the surrounding area for information. This information almost always leads to pinpointing the responsible party. Once found, we implement informal response actions.

In the very rare occurrence that the responsible party cannot be located then the County conducts cleanup activities through our Risk Management Department.

2. B. 1. Informal. The County discusses the violations with the responsible party and determines a plan for compliance. Inspection of the site will continue until the dumping has been properly cleaned up.

When the responsible party does not follow the agreed upon plan they undergo formal response.

2. B. 2. Formal. Fines. An administrative fine is a monetary penalty assessed by the County to the violator for a violation of municipal code, policy and/or standards. The fine may be assessed at the County's discretion and the amount of the fine may be determined on an individual basis.

2. B. 3. Judicial – see Part 3. Judicial.

2. C. *Construction Site Inspection*

Authority. The Columbia County Code of Ordinances Section 34 Article III governs land disturbance throughout construction.

2. C. 1. Informal. The County will pursue compliance assistance through multiple, informal methods whenever reasonable. These methods are appropriate for situations where education is needed, violations do not pose a significant danger to human health or the environment, or the County believes that compliance can be achieved by measures described below. Use of informal measures often establishes the documentation trail necessary for formal enforcement action and should therefore be sufficient to support the burden of proof.

Telephone contact or personal contact with the construction site operator may be chosen to obtain information and resolve isolated or infrequent violations. The contact will take place within three business days of determining a violation. Prompt responses will demonstrate to the construction site

operator that the County is serious about enforcing MS4 program requirements. It also helps to deter future violations.

At a minimum, the conversation shall be documented with the following information: date/time call placed, the person contacted, and the substance of the conversation.

2. C. 2. Formal. The Notice of Violation (NOV) is an official communication from the County to the violator which informs the party that a violation has occurred. It is issued for relatively minor or infrequent violations of the ordinance standards and requirements.

It is a prompt response to violations and documents the initial attempts of the County to resolve the noncompliance.

NOV's shall be sent via hand delivery and/or email within 24 hours after issuance. Re-inspection following the NOV will incur a re-inspection fee.

The county may issue stop-work orders to any party who is in violation of Chapter 34, Article III of the Columbia County Code of Ordinances pursuant to the following procedures:

For the first and second violations of the provisions of Chapter 34, Article III, the County shall issue a written notice to the violator. A notice may be in any written form, including without limitation, a memo, letter, directive or citation to appear in Magistrate Court. The violator shall have five (5) days to correct the violation. If the violation is not corrected within five (5) days, the County shall issue a stop-work order requiring that land-disturbing activities be stopped until necessary corrective action or mitigation has occurred; provided, however, that, if the violation presents an imminent threat to public health or waters of the state or if the land-disturbing activities are conducted without obtaining the necessary permit, the County shall issue an immediate stop-work order in lieu of a notice;

For a third and each subsequent violation, the County shall issue an immediate stop-work order; and when a violation in the form of (i) taking action without a permit, (ii) failure to maintain a stream buffer, or (iii) the discharge of significant amounts of sediment, as determined by the County, into state waters and/or wetlands, the County shall issue a stop work order; without issuing prior written notices.

All stop work orders shall be effective immediately upon issuance and shall be in effect until the necessary corrective action or mitigation has occurred. Such stop work orders shall apply to all land-disturbing activity on the project site with the exception of the installation and maintenance of temporary or permanent erosion and sediment controls.

SWO sites will be re-inspected every other business day until release. All re-inspections under the SWO will be subject to a re-inspection fee.

Owners/developers and contractors with unpaid re-inspection fees after 45 days will be restricted from receiving additional permitting.

2. C. 2. A. Bond Forfeiture

If the County determines that a person engaged in land-disturbing activities at a project where a bond was required pursuant to [Section 34-70](#) has failed to comply with the approved plan, the party responsible for the securing of the bond shall be deemed in violation Chapter 34, Article III and a written notice to comply shall be served upon that person advising that the bond is subject to forfeiture. The notice shall set forth the measures necessary to achieve compliance with the plan and shall state the time within which such measures must be completed. If the person engaged in the land-disturbing activity fails to comply within the time specified, in addition to other penalties applicable under Chapter 34, Article III, he shall be deemed to have forfeited their environmental bond. The County may call the bond, or any part thereof, to be forfeited and use the proceeds to hire a contractor to stabilize the site of the land-disturbing activity.

2. C. 2. 3. Judicial – see Part 3. Judicial.

Part 3. Judicial

A judicial action is an enforcement action that involves a court. The action may be civil litigation, criminal prosecution, or both.

Part 4. Violations and Range of Actions

The table below identifies the most common violations and indicates the potential circumstances associated with each violation. The Recommended Enforcement Response Plan, under a typical situation, is described in three levels of urgency.

Level 1 – Administrative issues with relatively low environmental risk and an infrequent record of violation by the construction site operator should cause the following enforcement sequence: Personal Contact -> Notice of Violation -> Stop Work Order -> Refusal of Municipal Inspections -> Administrative Order -> Judicial Action

Level 2 – Record keeping and site conditions that pose a relatively moderate/significant environmental risk to discharge pollutants into the MS4 or adjacent receiving waterbody should cause the following enforcement sequence: Personal Contact -> Notice of Violation -> Stop Work Order -> Refusal of Municipal Inspections -> Administrative Order or Bond Forfeiture

Level 3 – Any immediate threat to human health and environment or demonstrated willful non-compliance should cause the following enforcement sequence: Personal Contact -> Administrative Order with Administrative Fees -> Judicial Action with Administrative Fees

NONCOMPLIANCE	CIRCUMSTANCES OF VIOLATION	RECOMMENDED ENFORCEMENT RESPONSE PLAN
Failure to Prepare or Maintain a Storm Water Pollution Prevention Plan or Required Records	Operator is unaware of requirements to complete and maintain a SWPPP.	Level 1
	Operator is aware but does not follow requirements to prepare and maintain a SWPPP.	Level 2
Failure to Install, Maintain or Properly Select Best Management Practices per Approved Plan	Good faith effort has been demonstrated to select, install, and maintain BMPs	Level 1
	Operator has disregarded responsibilities to select, install, and maintain BMPs	Level 2
Conducting Covered Activity without Approval of Erosion and Sediment Control Plan	Operator is unaware of requirements to obtain approval for land disturbance activities.	Level 2
	Operator is aware of requirements to obtain approval for land disturbance activities but has not or has refused.	Level 3
Failure to Perform Inspections or Submit Required/Requested Reports and/or Documents	Infrequent occurrences	Level 1
	Frequent or routine occurrences	Level 2
Pollution Discharge to MS4, Contamination or Degradation of State Waters	Sediment or pollutants have left the perimeter of the construction area due to improper management of BMPs, but have caused little to no environmental damage.	Level 2
	Significant accumulation of sediment or pollutants in the MS4 or receiving waterbody that result from improper management of BMPs.	Level 3

Documented Pattern of Systematic Violations of Storm Water Regulations and/or Permit Requirements Prohibited Discharge	The County will consider violations on a project by project basis and an operator basis when determining awareness and good faith efforts.	Level 3
	Prohibited discharge into the MS4 where testing indicates minor amounts of pollutants in discharge; negligible environmental impact.	Level 1
	Prohibited discharge into the MS4 where testing indicates intermediate amounts of pollutants in discharge; moderate environmental impact.	Level 2
	Prohibited discharge into the MS4 where testing indicates significant amounts of pollutants in discharge; immediate environmental impact.	Level 3
Illicit Connection	Illicit connection to MS4 not currently discharging.	Level 1

Part 5. Time Frames for Enforcement Actions

The following table lists the enforcement responses, the maximum response time, and the person responsible to pursue or be informed of the action taken.

RESPONSE	TIME FRAME	RESPONSIBILITY
Telephone/personal contact	Within 72 hours of notification	Inspector
Refusal of Municipal Inspections	Immediate	Inspector
Notice of Violation	Within 7 days of notification	Inspector
Stop Work Order	After a NOV and prior to AO or AF whenever possible	Inspector
Administrative Order -Compliance Order -Consent Order -Cease and Desist Order -Show Cause Hearing	Within 90 days of violation	Inspector, Manager, Director, County Deputy Administrator, County Attorney, County Administrator
Administrative Fine	Within 90 days of violation	Inspector, Manager, Director, County Deputy Administrator, County Attorney, County Administrator
Termination/Suspension	Within 30 days of	Inspector, Manager, Director

	violation	
Bond Forfeiture	Case by Case	Inspector, Manager, Director, County Deputy Administrator, County Attorney, County Administrator
Judicial Actions	Case by Case	Inspector, Manager, Director, County Deputy Administrator, County Attorney, County Administrator