



# City of Tybee Island, Georgia

## Stormwater Management Program

National Pollutant Discharge & Elimination System (NPDES)

Phase I Medium Municipal Separate Storm Sewer System (MS4) Permit 2017

*Submitted to:*

Environmental Protection Division

Georgia Department of Natural Resources

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## ACRONYMS/DEFINITIONS

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BMPs	Best Management Practices
CIP	Capital Improvement Project
CSS	Coastal Stormwater Supplement
DoA	Georgia Department of Agriculture
E&S	Erosion & Sedimentation
EOS	Extent of Service
EPD	Georgia Environmental Protection Division
ESPCP	Erosion & Sedimentation Control Plan
GCB	Chatham Clean and Beautiful
GCDWR	Chatham County Department of Water Resources
GESA	Georgia Erosion & Sedimentation Act
GI/LID	Green Infrastructure/Low Impact Development
GIS	Geographic Information System
GSMM	Georgia Stormwater Management Manual
GSWCC	Georgia Soil & Water Conservation Commission
HazMat	Hazardous Materials
HVPS	Highly Visible Pollution Source
IDDE	Illicit Discharge Detection and Elimination
IGP	Industrial General Permit
LDA	Land Disturbing Activities
LEED	Leadership in Energy and Environmental Design
LIA	Local Issuing Authority
LID	Low Impact Development
MS4	Municipal Separate Storm Sewer System
MSDS	Materials Safety Data Sheet
MSWP	Master Stormwater Plan
NPDES	National Pollutant Discharge & Elimination System
NRCS	Natural Resources Conservation Service
O&M	Operations and Maintenance
ROW	Right-of-Way
SQAP	Sampling Quality Assurance Plan
SWMP	Stormwater Management Program
SWP3	Stormwater Pollution Prevention Plan

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## **EXECUTIVE SUMMARY**

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The City of Tybee Island received coverage under the National Pollutant Discharge and Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) Permit (GAS0002122) on April 12, 2017, as required by provisions of the Georgia Water Quality Control Act and the Federal Clean Water Act. A copy of the permit is included in Appendix A. This permit requires the development of a Stormwater Management Plan (SWMP), to address the following program elements, as stipulated in CFR 122.26(d)(2)(iv)(A) through 122.26(d)(2)(iv)(D):

- Structural and Source Control Measures
- Illicit Discharge Detection and Elimination
- Industrial Facility Stormwater Runoff Control
- Construction Site Runoff Management

The Georgia Environmental Protection Division (EPD) has also required the City of Tybee Island to expand its SWMP to include Best Management Practices (BMPs) to address the following required modifications:

- Highly Visible Pollutant Sources
- Enforcement Response Plan
- Impaired Waters Monitoring and Implementation
- Public Education
- Public Involvement
- Post Construction
- Green Infrastructure

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

### **SWMP IMPLEMENTATION RESPONSIBILITY**

The City of Tybee Island shares responsibility for BMP permit implementation with one other entities. Chatham County is responsible canal maintenance on Tybee Island in accordance with its Service Delivery Strategy and Memorandum of Agreement with the County, included in Appendix B.

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## **1. STRUCTURAL & SOURCE CONTROL MEASURES**

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

### **1.1. MS4 CONTROL STRUCTURE INVENTORY AND MAP**

#### **1.1.1. Description**

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

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

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

#### **1.1.2. Measurable Goals:**

- Provide an inventory and map of MS4 control structures.
- Update the inventory and map as necessary and provide the number of MS4 structures added during the reporting period in subsequent Annual Reports.

#### **1.1.3. Schedule**

- Annual, 2017 – 2023.

#### **1.1.4. Items to be included in Annual Report:**

- An updated inventory and map of the MS4.

## 1.2. MS4 INSPECTION AND MAINTENANCE PROGRAM

### 1.2.1. Description

The City will inspect 100% the MS4 features identified within the MS4 inventory over the five-year period of this permit, with at least one MS4 inspection occurring in each year. The City will visually inspect the MS4 within each maintenance zone in accordance with the following procedures:

- Inspections shall generally include a condition assessment of the various system elements including catch basins, ditches, and stormwater controls (i.e., detention ponds, bioretention cells, etc.).
- The condition assessment will include a visual evaluation of the structure that addresses structural condition and maintenance need. The following conditions will be noted and indicate that a structure is in need of maintenance:

*Table 1: MS4 Inspection & Maintenance Criteria*

<b>Structure</b>	<b>Standard for Maintenance</b>
Catch Basins	Sediment covers the lowest invert
Ditches	50% filled with sediment
Pipes	50% filled with sediment
Detention Ponds	50% filled with sediment

- Storm drain lines will be visually inspected where they outfall into a structure or open drainage way unless access is restricted due to obstructions.
- Upon completion of an inspection, the City shall make a determination of the need for maintenance based on the results of the inspection and the maintenance criteria.
- Inspections are currently document via an inspection log. However, the City is currently investing in software that will allow for inspections to be conducted using hand-held GPS equipment and to be recorded in an electronic database. Once this software is active, the City will move to recording MS4 inspections electronically and submitting the results in table format.

The City will perform maintenance of the MS4 based upon inspection findings. During inspection, the City will determine if maintenance of the various elements is needed. The City will also prioritize maintenance needs based on their potential impact to the functionality of the public MS4. Maintenance shall be prioritized and performed in general accordance with the following standards:

- The City shall schedule appropriate maintenance as needed and in accordance with available City resources.
- The City shall inspect all catch basins and inlets prior to major forecasted rain events to remove debris that could potentially block the flow of stormwater.



- The City shall respond to all citizen complaints related to MS4 structures and will perform maintenance as needed.
- All stormwater management structures shall be maintained such that they function in general accordance with their design and the standards, criteria, and information presented in the latest edition of the Coastal Stormwater Supplement and Georgia Stormwater Management Manual.
- Materials removed from the MS4 during maintenance shall be properly disposed of by the City's solid waste contractor.
- The City is in the process of installing PubWorks software to allow the City to maintain records of MS4 maintenance in an electronic database. Once installed, the City will complete work orders to schedule and record maintenance of MS4 structures.

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

*Table 2: Chatham County Canal Maintenance*

<b>Canal Name</b>	<b>Mileage</b>
Solomon	0.20
6 <sup>th</sup>	0.15
10 <sup>th</sup>	0.10
12 <sup>th</sup>	0.14

**1.2.2. Measurable Goals**

- Conduct inspections of the MS4 structures annually so that 100% of the structures are inspected within the five-year period.
- Conduct maintenance on MS4 structures as needed.

**1.2.3. Schedule**

*MS4 Inspections*

- Annual, 2017 - 2022

*MS4 Maintenance*

- Ongoing, 2017 - 2022: As Needed, based on inspections
- June 2018: Begin using PubWorks to record maintenance of MS4 structures

**1.2.4. Items to be included in Annual Report:**

- Summary of MS4 Inspections including the number and percentage of total structures inspected during the reporting period.
- Table of individual inspection reports with a record for each structure inspected, and the findings of that inspection.
- Summary of number of structures maintained.
- Summary of PubWorks Work Orders Created and Completed Related to MS4 structures maintenance, once PubWorks is installed.

### 1.3. PLANNING PROCEDURES

#### 1.3.1. Description

##### 1.3.1.A. *Comprehensive Plan*

The City of Tybee Island's Comprehensive Plan (alternatively known as the Master Plan) outlines goals and specific policies that are designed to protect the local quality of life. The Comprehensive Plan guides future land use, provides the framework for the City's zoning code, address natural resource protection, and recommends stormwater infrastructure improvements. The City adopted the Comprehensive Plan to meet planning goals through the year 2026, and can be viewed at the following weblink:

<http://www.crc.ga.gov/publications/planning/Comp%20Plan%20Draft%20-%20Tybee%20Island%208-29-16.pdf>

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

Vision: "As concerned citizens of The City of Tybee Island, we will be conscientious stewards of our unique historic and cultural heritage, environmental resources, and diverse economic community. We will also ensure that our growth does not exceed the Island's carrying capacity.

##### Goals:

- Maintain, preserve and enhance our community open spaces, such as parks, greenbelts, and wildlife corridors
- Protect and preserve our environmentally sensitive areas, including beaches, natural terrain, drainage areas, vegetation, coastal marshlands, wildlife habitat and corridors, and floodplains

##### 1.3.1.B. *Carrying Capacity Study*

In order to understand the limiting factors for future development, the City of Tybee Island conducted a Carrying Capacity Study (CCS). This study, completed in September 2016, was designed to quantify (where possible) the island's resources and to better understand how much development these limited resources can support without degrading the quality of life that makes Tybee Island such a unique coastal community.

Some of the key issues related to population growth and seasonal variability that were identified by this analysis are as follows: 1) Limit in the permitted water withdrawal from the Floridan Aquifer; 2) Significant increases in water withdrawal, wastewater discharge, and solid waste/litter generation during tourism season; 3) Effects of king tides and sea level rise on the stormwater drainage system; 4) Development pressure in the R-2 zoning

district, the highest density residential district which is also subject to king tide flooding; and  
5) Energy usage by the City in its daily operations.

This document can be viewed at the following weblink:

[http://weblink.cityoftybee.org/WebLink/0/edoc/24883/CCS\\_Report\\_Final\\_093016.pdf](http://weblink.cityoftybee.org/WebLink/0/edoc/24883/CCS_Report_Final_093016.pdf)

**1.3.2. Measurable Goals**

- Review and update as needed the Comprehensive Plan and the Carrying Capacity Study.

**1.3.3. Schedule**

- Annual, 2017 – 2022: Review planning procedures

**1.3.4. Items to be included in the Annual Report**

- A description of any changes made to the Comprehensive Plan or Carrying Capacity Study

## **1.4. STREET MAINTENANCE**

### **1.4.1. Description**

#### *1.4.1.A. Street Sweeping Program*

The City implements a street sweeping program to reduce polluted runoff originating from streets with curb and gutter systems. The street sweeper is operated every Monday and Friday along streets and in public parking lots. It is also used to clean after heavy storms and for street and parking lot cleanup after special events. Debris picked up collected at the Department of Public Works and hauled to the landfill by the City's waste management contractor. The City will maintain a log of street sweeping activities.

Street sweeping schedule: Every week on Mondays and Fridays. Average is 10 miles of road shoulder each day. Streets included on the daily route are: Hwy 80, Strand, Tybrisa Street, and the South End parking lots. The City also sweeps 14<sup>th</sup> Street and 18<sup>th</sup> Street on an as-needed basis.

#### *1.4.1.B. Roadside Ditch Maintenance*

Roadside ditches that are located within the City Right-of-Way (ROW) are considered part of the public MS4 and are inspected and maintained by the Public Works Department to ensure effective operation. The City of Tybee Island currently maintains 36 miles of roadside ditches.

- Rights-of-way are mowed bi-monthly during the growing season and ditches are inspected at that time.
- When roadside ditch inspections indicate that emergent vegetation is interfering with normal flow, excess emergent vegetation will be removed by hand or machinery to ensure proper functioning of the ditches.
- Roadside ditches are cleaned if accumulated sediment or other deposits exceed the design depth.
- Litter and debris are removed by the City crews prior to mowing the ROW and are disposed of at a local landfill by the City's waste hauler.
- Roadside ditch inspection and maintenance activities will be recorded in a log and included in the Annual Report.

#### *1.4.1.C. Street Litter Program*

The City maintains and services garbage cans within the right of way to encourage people to property dispose of litter. These cans are emptied by City crews four times per week and the debris is taken to Public Works where it is hauled to the landfill by the City's waste contractor.

#### 1.4.1.D. De-icing Procedures

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

#### 1.4.1.E. Roadway Construction Erosion & Sedimentation Control

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

#### 1.4.2. Measurable Goals:

- Perform routine street sweeping activities for curb and gutter roads and parking lots weekly.
- Maintain roadside ditches maintenance bi-monthly during growing season.
- Service garbage cans in the ROW on a weekly basis.

#### 1.4.3. Schedule

- Ongoing: 2017 – 2022.

#### 1.4.4. Items to be included in Annual Report

- Provide documentation of street sweeping activities.
- Provide documentation of trash and debris removal activities including amount of trash and debris removed from the ROW during roadside ditch maintenance activities, and amount of trash disposed of from the garbage cans in the ROW.

## **1.5. FLOOD MANAGEMENT PROJECTS**

### **1.5.1. Description**

#### *1.5.1.A. Flood Management Capital Improvement Project Water Quality Impact Assessment for New Structures*

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

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

#### *1.5.1.B. Flood Management Capital Improvement Project Water Quality Impact Evaluation for Existing Structures*

The City of Tybee Island operates a Capital Improvement Program to address structural flood management and drainage issues within public systems within the ROW. As part of this program, the City identifies the various drainage and flooding problems within the City and develops a proposed engineered solution to the problem in the form of a Capital Improvement Project (CIP.) CIPs may include the installation of a new structure or the retrofit, upgrade, or replacement of an existing, inadequate structure.

The City of Tybee Island, or a contracted consultant, will conduct a water quality impact assessment during the design phase for drainage and flooding related CIPs as funding becomes available for their implementation. This assessment will be integrated with the City's current Capital Improvement Program such that as identified CIPs are funded for implementation, an assessment will be performed during the design phase. The assessment must be completed before the design of drainage CIP has been completed. The assessment will ensure that the drainage or flood-related CIP addresses the following:

- A description of how the proposed CIP will improve water quality.
- A description of potential water quality impacts from the proposed CIP and recommendation for mitigation of any impacts.
- The feasibility and/or cost of incorporating water quality enhancements in the CIP.

- Identification of the regulatory permits needed to construct the project including, but not limited to, an NPDES construction permit and a Section 404 permit.
- A statement stating that the project adheres to the City's design criteria and CSS.

The City will use the Capital Improvement Project (CIP) Stormwater Impact Assessment checklist to perform the assessment, a copy of which is included in Appendix D. The assessment for each CIP design will become a permanent part of the CIP file, and will be provided to EPD in the Annual Report.

**1.5.2. Measurable Goal:**

- Ensure new flood management projects are assessed for water quality impacts in accordance with the City's Stormwater Management Ordinance.
- Evaluate existing flood control devices as part of the City's Capital Improvement Program to determine if retrofitting the devices for additional pollutant removal is feasible.

**1.5.3. Schedule**

- Annually, 2017 – 2022: Ensure all new Flood Management Projects are assessed for water quality impacts.
- Annually, 2017 – 2022: Review all existing flood management facilities that are retrofitted through the City's CIP program during the reporting period.

**1.5.4. Items to be included in the Annual Report**

- The number of plans that included new flood management projects that were reviewed during the reporting period.
- A summary of all water quality assessments of existing flood management control structures that occurred during the reporting period.

## **1.6. MUNICIPAL FACILITIES**

### **1.6.1. Description**

This program element will address the following municipally-owned facilities with the potential to cause pollution, that are not addressed in Section 3.3.3, which will be referred to collectively as “Municipal Facilities.” This list constitutes the City’s inventory of municipal facilities with the potential to cause pollution.

- Wastewater Treatment Plant (WWTP)
- Public Works Site

City staff will inspect municipal facilities with the potential to discharge pollutants to the MS4; and all municipal facilities sites will be inspected at least once every 5 years. The Stormwater Site Inspection Checklist, found in Appendix D, shall be used for municipal site inspections and records shall be maintained on problems found and actions taken. If sites are found to need improvements, the appropriate department will be notified of the problem. City staff will then perform a re-inspection, after the stipulated timeframe, to ensure that proper action has been taken.

### **1.6.2. Measurable Goals**

- The City will update the municipal facilities inventory annually with each annual report.
- The City will annually inspect the municipal facilities on the municipal water facilities inventory such that 100% of all the inventories facilities are inspected every 5 years.
- The City will utilize the stormwater site inspection checklist to record inspections.

### **1.6.3. Schedule**

- 2017 – 2022, Inspect 100% of municipal facilities

### **1.6.4. Items to be included in the Annual Report**

- A copy of the completed inspection checklist for each municipal facility.
- A summary of any activities conducted to address issues found during inspection, if necessary.



## **1.7. PESTICIDE, HERBICIDE, & FERTILIZER APPLICATION**

### **1.7.1. Description**

#### *1.7.1.A. Pesticide Applicator Certification Program*

The City of Tybee Island relies on the Georgia Department of Agriculture (DoA) to address requirements for Pesticide Applicator Training and Certification. The DoA requires commercial applicators of pesticides (herbicides and insecticides) to obtain and retain a "Commercial Pesticide Applicators License." The DoA also requires that distributors of restricted pesticides obtain and retain "Distributor Licenses." Continuing education units are required each year to maintain the license.

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

#### *1.7.1.B. Municipal Pesticide Use Standard Operating Procedures*

The City of Tybee Island does utilize minimal amounts of household-use pesticides, herbicides or fertilizers in the maintenance of City grounds or right-of-ways. The City's SOP for use of these chemicals is stated below:

1. Herbicide Application – Fertilizer is used on an as-needed basis on rights-of-way, parks, ditches, sidewalks, and around City maintained buildings. The weed killer Clear-Out is used as needed on sidewalks, medians, rights-of-way, around trees, signs, and City maintained structures. The mixture is 16 ounces to 3 gallons of water.
2. Pesticide Application – Pesticides such as ant killer and wasp killer are only used as a form of maintenance on sidewalks and around City maintained structures.
3. Chemical application is only conducted during days when it is not raining, and rain is not predicted and when it is not windy.
4. All pesticides, fertilizers, and herbicides are kept covered in their proper labeled containers and stored at the Department of Public Works.
5. The City will comply with the GDoA Program, as needed and appropriate, with regards to training and certification of staff.

#### **1.7.2. Measurable Goals:**

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

**1.7.3. Schedule:**

- Ongoing, 2017-2022: Continue to require GDoA Program Certification for commercial applicators applicable city Staff.
- Ongoing, 2017-2022: Continue to abide by the SOP.

**1.7.4. Items to be Included in the Annual Report:**

- Documentation of any program activities during the reporting period.

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## **2. ILLICIT DISCHARGE DETECTION & ELIMINATION (IDDE)**

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

### **2.1. LEGAL AUTHORITY**

#### **2.1.1. Description**

The City of Tybee Island has established adequate legal authority through Article 16: Stormwater Management Ordinance of the Tybee Island Land Development Code, last updated in October 2014 to prohibit illicit discharges and conduct an illicit discharge detection and elimination program. This ordinance prohibits illicit discharges to the public MS4, grants the City the authority to enter private property to investigate suspected illicit discharges, and also provides the City with the means to enforce violations of this ordinance. The ordinance is included in Appendix B.

#### **2.1.2. Measurable Goal**

- Each year, the City will evaluate the Illicit Discharge Ordinance to determine if revisions are required.

#### **2.1.3. Schedule**

- Annual, 2017 - 2022: Annual Review of Illicit Discharge and Illegal Connection Ordinance

#### **2.1.4. Items to be included in the Annual Report**

- If revisions are required, submit a copy of the revised ordinance to EPD in the Annual Report.

## **2.2. OUTFALL INVENTORY & MAP**

### **2.2.1. Description**

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

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

### **2.2.2. Measurable Goals**

- The City will maintain and update a map showing the location of all outfalls from the MS4, which outfalls are “wet”, and the names and location of all waters of the State that receive discharges from those outfalls as part of the City’s annual report.
- The City will maintain and update a database inventory of all outfalls from the MS4 within the City Limits of Tybee Island and provide with the City’s annual report.

### **2.2.3. Schedule**

- Annual, 2017-2022 – Update MS4 Outfall Map and Inventory

### **2.2.4. Items to be included in the Annual Report**

- Number of MS4 outfalls added during the reporting period and the total number of MS4 outfalls from the City’s MS4.
- An updated inventory and map of the MS4 outfalls, identifying which MS4 outfalls are “wet”, with the names and locations of all waters of the State that receive discharges from those outfalls.

## **2.3. IDDE PLAN**

### **2.3.1. Description**

The City of Tybee Island's IDDE Plan consists of inspecting MS4 outfalls to determine if upstream facilities/connections are discharging non-stormwater flows to the drainage system and eliminating all identified illicit discharges. The IDDE Plan is included in Appendix E.

The City will perform inspections and/or dry weather screening of the MS4 outfalls within its current inventory in accordance with the procedures outlined in the IDDE Plan. The City will investigate any potential illicit discharges in accordance with the procedures in the IDDE Plan. Suspect or obvious illicit discharges require follow-up actions and activities, as specified in the IDDE Plan to determine the specific source(s) of contamination. Should the City positively identify any illicit discharges, the City will perform enforcement actions as dictated by the Illicit Discharge Ordinance and the IDDE Plan to remove positively identified illicit discharges.

### **2.3.2. Measurable Goals**

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

### **2.3.3. Schedule**

- Annual, 2017 – 2022 – Inspect MS4 Outfalls in accordance with IDDE Plan
- Ongoing, 2017 - 2022 – Perform source tracing
- Ongoing 2017 - 2022 – Enforce Illicit Discharge Ordinance

### **2.3.4. Items to be Included in the Annual Report**

- Provide the number of MS4 outfalls inspected during the reporting period.
- Provide a map and completed dry weather screening forms for all MS4 Outfalls screened within the reporting period.
- Records of any source tracing or enforcement activities conducted as a result of the dry weather screening activities.

## **2.4. SPILL RESPONSE PROCEDURES**

### **2.4.1. Description**

When a spill of any potentially polluting material, such as sanitary sewage or hazardous materials, occurs on Tybee Island, the first responders are either Public Works staff or the Fire Department. City staff will initially contain the spill, remove and properly dispose of the material, and clean the site. If it is a hazardous material, the City may call Savannah HazMat team or a private contractor to respond and address cleanup.

All new City of Tybee Island staff that work with potentially hazardous materials are trained within one year of the start of employment on proper use, storage, and disposal of commonly used hazardous or potentially polluting materials. Current staff received the training at the outset of the program. This training occurs during an in-house Safety Meeting conducted by the Public Works Department. Hazardous materials addressed by this training program include oil and other petroleum products, pesticides, and any other material for which a Materials Safety Data Sheet (MSDS) is provided.

Tybee staff will maintain records of any spills that occur and how those spills were resolved. Those records will be summarized and included in the Annual Report.

### **2.4.2. Measurable Goal**

- Maintain documentation on any spill occurrences and cleanup performed.

### **2.4.3. Schedule**

- Annual 2017 - 2022: Maintain documentation of any spills and cleanup activities.

### **2.4.4. Items to be included in the Annual Report**

- Documentation on any spill occurrences and cleanup performed.

## **2.5. PUBLIC REPORTING PROCEDURES**

### **2.5.1. Description**

The City of Tybee Island has established procedures for encouraging and addressing citizen complaints about water quality. City Hall and Public Works are responsible for receiving citizen complaint calls, and Public Works is responsible for taking action to address calls. Actions taken by Public Works may include visual inspections, field screening, line televising, and dye testing, or contacting another agency to investigate. The Tybee Island Police Department manages complaint calls after hours and directs the complaint to an on-call operator. Responses to citizen complaints are normally initiated within one business day. Written response is normally achieved within 3 business days. Any required action for repair or maintenance is dependent on the character of the discovery and determination of field conditions.

The Department of Public Works maintains a log of citizen complaints received related to potential illicit discharges, illegal dumping, and other water quality violations and include actions taken by the Director in response to the complaint. The City of Tybee Island is in the process of implementing the PubWorks work order system for tracking responses to citizen complaints in an electronic format.

The City of Tybee Island maintains a link on the City's official website that allows for citizens and visitors to report concerns, including illicit discharges and illegal dumping. The link to this page can be found on the City's website. This website also provides a link as well as a phone number 912-786-4573 for City residents to contact the City for any purpose including a request for service and/or report illicit discharges to the storm sewer system. Information received through the website will be referred to the appropriate department. The City promotes this webpage as a part of other public education initiatives.

### **2.5.2. Measurable Goals**

- Promote, publicize and facilitate public reporting of illicit discharges by through the City's website.
- Investigate and take appropriate action for 100% of complaints received.

### **2.5.3. Schedule**

- Ongoing, 2017 – 2022: Take action for complaints received, as appropriate.
- Annual, 2017 – 2022: Update website with promotional and educational information.

### **2.5.4. Items to be included in the Annual Report**

- Summary of the citizen complaints received, to include documentation of complaints, investigations, and actions taken during the reporting period.

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

### **2.6.1. Description**

#### *2.6.1.A. Hazardous Material Public Education*

The City of Tybee Island will include information on the City's website related to the proper disposal of household hazardous materials, including municipal solid waste, electronics, recycling, and plastic bags. The website includes a listing of facilities and businesses that will accept electronics and plastic bags from the general public, which can be found at the follow web address: <http://www.cityoftybee.org/190/Recycling>. The City has also included information on proper disposal of hazardous wastes on its Stormwater Web page, which can be found at the following link: <https://www.cityoftybee.org/357/Storm-Sewer-Drainage>

The City also maintains a link to the Chatham County Resources Conservation Education website, which provides online information for proper disposal and/or recycling of hazardous household materials. The link for this site is below:

<https://recycling.chathamcountyga.gov/RecyclingDropOff/HardMaterials>

#### *2.6.1.B. Used Oil Recycling*

The City's Public Works Department operates a transfer station that recycles used motor oil from Tybee Island's vehicle fleet through Coastal Refinery of Savannah, GA.

### **2.6.2. Measurable Goals:**

- Promote proper management and disposal of used oil and toxic materials by maintaining information on the City's website.
- Operate the used oil recycling program for the City's fleet vehicles.

### **2.6.3. Schedule**

- Ongoing, 2017 – 2022: Maintain information on City website
- Ongoing, 2017 – 2022: Operate City fleet used oil recycling program.

### **2.6.4. Items to be included in the Annual Report**

- Details of any activities performed during the reporting period including an estimate of recyclables collected.



## **2.7. SANITARY SEWER INFILTRATION CONTROLS**

### **2.7.1. Description**

The City of Tybee Island implements an inflow and infiltration (I&I) program to determine if the sanitary sewer system has any leaks, damage, or cross connections with the storm sewer or drainage system. Inspections of the sanitary sewer system are conducted, and maintenance or capital improvements are performed as needed based on the inspections. The City of Tybee Island contracts with Southeastern Pipe Survey to clean, camera, and repair sanitary sewer mains. This company also performs manhole inspections and repairs for the City of Tybee Island. Maintenance may include repair, relining, or replacement of malfunctioning system elements. City staff also conduct daily visual inspections of 11 lift stations to ensure they are operating correctly. During the period of 1995 to 2000, all sewer lines were slip lined, repaired or replaced, so the City's sanitary sewer collection system is relatively new.

### **2.7.2. Measurable Goal:**

- Perform daily inspections of lift stations.
- Inspect 100% of suspected sewage spills from the sanitary sewer system reported to or by Tybee Island.
- Resolve 100% sanitary sewer overflows or cross connections.
- Record and maintain information on all sanitary sewer spills in a database.

### **2.7.3. Schedule**

- Ongoing, 2017 – 2022: Investigate and address suspected sewer overflows or discharges

### **2.7.4. Items to be Included in the Annual Report**

- Details on activities performed during the reporting period as recorded in the sanitary sewer spill database.

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### **3. INDUSTRIAL FACILITIES STORMWATER DISCHARGE CONTROL**

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

#### **3.1. INDUSTRIAL FACILITY INVENTORY**

##### **3.1.1. Description**

The City of Tybee Island does not currently have any industrial facilities that discharge to the City's MS4 and are included on the EPD's list of facilities covered under the Industrial Storm Water General Permit (IGP) or included under either the Notice of Intent (NOI) or No Exposure Exclusion (NEE) online listings. The City also does not have any property zoned for industrial development. The City of Tybee Island will continue to review these lists annually and develop an inventory of any industrial facilities, if any facilities apply for coverage under the IGP in the future. The City will include any changes to the inventory in the Annual Report.

##### **3.1.2. Measurable Goals**

- Annual creation/update of Industrial Facility Inventory

##### **3.1.3. Schedule**

- Annual, 2017 – 2022: Create/Update Industrial Facility Inventory

##### **3.1.4. Items to be Included in the Annual Report**

- Updated Industrial Facility Inventory

### **3.2. INDUSTRIAL STORMWATER INSPECTION PROGRAM**

In the event that an industrial facility is listed on the City's Industrial Facility Inventory, the City will conduct on-site stormwater inspections for 100% facilities on the Industrial Facility Inventory over the course of the five (5) year permit period (2017 – 2022.)

- City staff will first determine whether the industrial facility discharges to the City MS4. If the facility does not discharge to the City MS4, it shall be removed from the Industrial Facility Inventory.
- City staff will check to ensure that the facility has submitted a Notice of Intent to be covered under the NPDES Industrial General Permit (IGP), if it is required.
- City staff will perform a cursory review of the implementation status of the facility's associated Stormwater Pollution Prevention Plan (SWP3).
- The City will perform an inspection of the facility utilizing the stormwater site inspection checklist included in Appendix D.
- Should an inspection reveal a potential threat to water quality in the MS4, City staff will notify the industry or business, provide them with a copy of the inspection checklist, and perform a re-inspection to ensure that all necessary corrections were made.
- Enforcement of any identified illicit discharges will be handled in accordance with the City's Illicit Discharge Ordinance and Enforcement Response Plan.
- If the violation is still not corrected, EPD will be notified of the problem. The City will also notify the EPD if assistance is needed for enforcement of the NPDES IGP or if there is a threat to Waters of the State. If EPD intervention does not ensure a resolution to the problem, the City of Tybee Island may elect to perform water quality monitoring at the facility outfall. In addition, the City may, during the investigation of a violation of the City's IDDE Ordinance, complete or require monitoring of a suspected industrial facility, in order to secure evidence to support the alleged violation.
- The City shall maintain records of inspections results, problems found, and actions taken. Documentation of these inspections will be submitted each year with the Annual Report.

#### **3.2.1. Measurable Goals**

- Inspect 100% of industrial facilities in the City's Industrial Facility Inventory over the 5-year permit period and inspect at least 5% of the industrial facilities in the inventory each year.
- Provide water quality monitoring results, if monitoring is conducted.

#### **3.2.2. Schedule**

- Annual, 2017 – 2022: Inspect at least 5% if industrial facilities

**3.2.3. Items to be Included in the Annual Report**

- Copy of completed inspection checklist for each industrial facility inspected during the reporting period.

### **3.3. ENFORCEMENT PROCEDURES**

#### **3.3.1. Description**

If upon inspection, an industrial site is found to have issues that would be considered an illicit discharge, then the City will proceed to an enforcement action as outlined in the Enforcement Response Plan. If an illicit discharge has not taken place but practices on site indicate a high probability that such a discharge could occur, then the City will notify the property owner and/or the operator of the site, as outlined in Section 3.2.1. The City will perform a reinspection to ensure that the owner/operator has adequately addressed the identified issues.

#### **3.3.2. Measurable Goals:**

- Implement enforcement procedures when violations are discovered during inspections of industrial facilities.
- Document enforcement actions taken in violation/enforcement action log.

#### **3.3.3. Schedule**

- Ongoing, 2017 – 2022: Document enforcement actions in violation/enforcement log.

#### **3.3.4. Items to be Included in Annual Report**

- Documentation of enforcement action taken during the reporting period

### **3.4. EDUCATIONAL ACTIVIITIES**

#### **3.4.1. Description**

The City will distribute the EPD's informational handout on the requirements of the NPDES IGP or other industrial stormwater best practices educational information to industrial facilities during industrial stormwater site inspections.

#### **3.4.2. Measurable Goals**

- Provide educational information industrial facilities on the City's inventory during inspections

#### **3.4.3. Schedule**

- Annual, 2017 – 2022: Provide education information to industrial facilities during inspections

#### **3.4.4. Items to be included in the Annual Report**

- Copy of educational information distributed to industrial facilities

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## **4. CONSTRUCTION SITE MANAGEMENT**

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*Permit Section 3.3.4: Construction Site Management, Table 3.3.4*

### **4.1. LEGAL AUTHORITY**

The City has adopted the most current model Soil Erosion, Sedimentation, and Pollution Control Ordinance (E&S Ordinance), as written and distributed by EPD, and it is included in Appendix B. This ordinance meets the requirements of the NPDES Phase I MS4 Medium Permit and the requirements of the Georgia Erosion and Sedimentation Act (GESA).

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

#### **4.1.1. Measurable Goals**

- Annually evaluate the E&S Ordinance to determine if revisions are required.

#### **4.1.2. Schedule**

- Annual, 2017 – 2022: Annual Review of E&S Ordinance

#### **4.1.3. Items to be Included in the Annual Report**

- If revisions are required, submit a copy of the updated ordinance.

## **4.2. SITE PLAN REVIEW PROCEDURES**

### **4.2.1. Description**

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

The City's E&S Ordinance includes a requirement that no LDA permit shall be issued unless the Erosion, Sedimentation, and Pollution Control Plan (ESPCP) has been reviewed and approved by the NRCS. Plans are accepted and reviewed by the City of Tybee Island staff and provided to the NRCS for their review and approval. The ESPCP must meet the requirements of GESA and Tybee Island's E&S Ordinance, which includes the requirement to control turbidity in the site runoff, control impacts on receiving streams, and the implementation of the minimum control measures. This ensures the proposed ESPCP control measures will comply with the City's E&S Ordinance and effectively reduce pollutants entering the MS4.

### **4.2.2. Measurable Goals**

- Provide 100% of ESPCPs to NRCS for their review and approval of compliance with GESA and the Tybee Island E&S Ordinance.
- Grant LDA permits only after ESPCP is approved by NRCS.

### **4.2.3. Schedule**

- Ongoing, 2017 – 2022: Review ESPCP as they are submitted

### **4.2.4. Items to be Included in the Annual Report**

- Number of site plans reviewed, approved, or denied during the reporting period.
- Number of Land Disturbance Activity Permits issued during the reporting period.



### **4.3. INSPECTION PROCEDURES**

#### **4.3.1. Description**

The Tybee Island Planning and Development Department is responsible for the inspection program that targets all construction projects within the city limits. The inspections include checking all E&S control measures for compliance with the approved E&S plans and LDA Permit. The authority for such inspections follows the City's E&S Ordinance. If, upon inspection, a construction site is found to be in non-compliance with its approved E&S plan, LDA Permit, and the minimum requirements of the E&S Ordinance, the Planning and Development Department Code Enforcement Division is responsible for enforcing the provisions of the E&S Ordinance. Enforcement measures can include notices of violation, stop work orders, and fines.

Inspections shall be conducted before, during and after land disturbance in accordance with the following procedure:

- City staff will conduct site inspections of all sites that have an LDA Permit after land disturbing activities commence to verify compliance with all applicable E&S requirements.
- Once a site is under construction it will be monitored through inspections on a regular basis until the site is stabilized. Inspections during the construction process will be prioritized as follows:
  - A significant rain event
  - Evidence of poor housekeeping
  - History of poor compliance
  - Evidence of absent or malfunctioning controls
  - Proximity to local waterways
- A final comprehensive site inspection will be conducted at all LDA Permit sites after land disturbing activities have ceased to ensure that the site has been adequately stabilized and that all excess materials have been removed.
- An E&S Inspection Checklist will be completed during each inspection. This checklist is important to document the inspection history and the record of compliance. Records of inspections, violations and enforcement actions will be kept by the Planning and Development Department.
- If enforcement measures are required, they shall be implemented in accordance with the SWMP, City's E&S Ordinance, and the Enforcement Response Plan.

#### **4.3.2. Measurable Goals**

- Inspect 100% of construction sites with LDA permits after installation of initial BMPs, during construction, and at the close of land disturbing activities.
- Maintain records of all inspection activities conducted during the reporting period.

**4.3.3. Schedule**

- Ongoing, 2017 – 2022: Inspections of active construction sites with a Land Disturbance Activity Permits.

**4.3.4. Items to be Included in Annual Report**

- Number of active construction sites and number of inspection activities occurring during the reporting period.

#### **4.4. ENFORCEMENT PROCEDURES**

##### **4.4.1. Description**

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

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

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

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

For a more detailed description of enforcement procedures regarding E&S violations, the reader is directed to the Enforcement Procedures located in the E&S Ordinance included in Appendix B and the ERP included in Appendix F.

##### **4.4.2. Measurable Goals**

- Follow enforcement procedures outlined in the City's E&S Ordinance and ERP for violations documented at construction sites.

##### **4.4.3. Schedule**

- Ongoing, 2017 -2022: Implement enforcement procedures as appropriate based on the results of E&S inspections

##### **4.4.4. Items to be Included in the Annual Report**

- Documentation of enforcement actions taken during the reporting period including the number and type (e.g., Notice of Violation, Stop Work Order)

## **4.5. EDUCATIONAL/TRAINING ACTIVITIES**

### **4.5.1. Description**

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

### **4.5.2. Measurable Goals**

- Ensure all MS4 staff involved in construction activities subject to the Construction General Permits (CGPs) are trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission

### **4.5.3. Schedule**

- Ongoing 2017 - 2022: Education/Training Activities

### **4.5.4. Items to be Included in the Annual Report**

- Provide a summary of the training attended during the reporting period
- Provide the number and type of current certifications held by MS4 staff

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## **5. HIGHLY VISIBLE POLLUTANT SOURCES (HVPS)**

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*Permit Section 3.3.5: Highly Visible Pollution Sources, Table 3.3.5*

### **5.1. HVPS FACILITY INVENTORY**

#### **5.1.1. Description**

The City maintains an inventory of commercial businesses and facilities that are considered to be highly visible pollutant sources (HVPS). Based on the types of facilities and the results of HVPS inspections conducted over the past permit cycle, the City now considers the following types of businesses to be HVPS:

- Auto Repair / Maintenance Facilities
- Gas Stations
- Vet Offices / Kennels

The HVP inventory will be updated annually based on changes to the business license database and will be included in each annual report.

#### **5.1.2. Measurable Goals**

- Update the HVPS Inventory on an annual basis.

#### **5.1.3. Schedule**

- Annual, 2017 – 2022: Update HVPS Inventory

#### **5.1.4. Items to be Included in Annual Report**

- Updated HVPS Inventory

## **5.2. HVPS STORMWATER INSPECTION PROGRAM**

The City will be responsible for conducting stormwater inspections on-site at facilities on the HVPS inventory list such that 100% of facilities are inspected over the permit period (2017 – 2022), and at least 5% are inspected in any given year.

A City inspector will visit the HVPS site and assess the condition and presence of pollutants on-site. The Stormwater Site Inspection checklist, included in Appendix D, shall be used to record the inspection results. City staff will inspect the site for evidence of stormwater pollution in the following areas, if applicable, and this information will be noted:

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

Documentation shall be maintained on all inspections, problems found, and actions taken.

### **5.2.1. Measurable Goals**

- Inspect 100% of HVPS sites within the 5-year permit period, with at least 5% inspected in any given year.

### **5.2.2. Schedule**

- Annual, 2017 – 2022: Complete inspections of at least 5% of approximately HVPS Sites each year

### **5.2.3. Items to be Included in the Annual Report**

- Provide the total number of HVPS facilities and the number and percentage of inspections conducted during the reporting period.
- Provide a completed checklist for each inspected HVPS site conducted that reporting period.

### **5.3. ENFORCEMENT PROCEDURES**

#### **5.3.1. Description**

If upon inspection, an HVPS site is found to have an illicit discharge, then the City will proceed to an enforcement action as outlined in the IDDE Plan and/or the Enforcement Response Plan. If an illicit discharge has not taken place but practices on site indicate a high probability that such a discharge could occur, then the City will discuss any issues uncovered by the inspection with the property owner and/or the operator. Generally, the City will attempt to notify property owners / operators within 10 business days of the initial inspection, if issues are discovered. The City will then re-inspect the site within 1 year to determine if corrective actions have been taken.

For violations that continue unabated, the City will implement the enforcement provisions of the Stormwater Ordinance and the ERP, as approved by EPD, including issuing violations, sending notifications, and taking enforcing measures necessary to abate the violation and/or restore the property.

#### **5.3.2. Measurable Goal(s)**

- Implement enforcement procedures for violations noted during HVPS inspections, as specified in the ERP.

#### **5.3.3. Schedule**

- Ongoing, 2017 – 2022: Take enforcement actions, as needed and appropriate.

#### **5.3.4. Items to be included in Annual Report**

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

## **5.4. EDUCATIONAL ACTIVITIES**

### **5.4.1. Description**

The City's Stormwater Webpage contains information to inform HVPS owners/operators how to control stormwater pollution according to their specific commercial activities. Two categories of HVPS that are targeted through this educational effort are restaurants and automotive businesses. In addition, City staff distribute educational materials during HVPS inspections.

### **5.4.2. Measurable Goal(s)**

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

### **5.4.3. Schedule**

- Ongoing, 2017 – 2022: Maintain educational materials on website
- Annual, 2017 – 2022: Distribute educational materials during HVPS inspections

### **5.4.4. Items to be included in Annual Report**

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



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## **6. ENFORCEMENT RESPONSE PLAN (ERP)**

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### *Permit Section 3.3.6: Enforcement Response Plan (ERP)*

#### **6.1. ERP IMPLEMENTATION**

##### **6.1.1. Description**

The City of Tybee Island has developed and will continue to implement the City's ERP, which includes the ordinances providing legal authority, types of enforcement mechanisms available, escalation of enforcement, time frames for investigation, and the method to be used to track instances of non-compliance. The ERP, included in Appendix F, was approved by EPD in correspondence dated September 3, 2014. It has been updated based on comments received by EPD in April 2020. The City will review the ERP annually and revise as necessary. If the ERP is revised, the City will submit it to EPD for review.

##### **6.1.2. Measurable Goal(s)**

- Review the ERP Annually

##### **6.1.3. Schedule**

- Ongoing, 2017 – 2022: Take enforcement actions, as needed and appropriate
- Annual, 2017 – 2022: Review and update ERP, if necessary.

##### **6.1.4. Items to be included in Annual Report**

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

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## **7. MONITORING FOR DISCHARGES TO IMPAIRED WATER BODIES**

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### *Permit Section 3.3.7: Impaired Waterbodies*

**At this time, the 2020 draft 303(d) list of coastal streams shows that there are no impaired waterways located within the jurisdictional boundary of Tybee Island, therefore no Impaired Waterbody Monitoring and Implementation Plan is required.**

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## **8. MUNICIPAL EMPLOYEE TRAINING**

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### *Permit Section 3.3.8: Employee Municipal Training*

#### **8.1.1. Description**

The City of Tybee Island will conduct employee training for those employees who work in any municipal facility or function that has the potential to contribute pollutants to the MS4. This training will occur once per year during a Public Works Safety Meeting. Alternatively, the City may send employees to an applicable training course. City employees will be trained during each permit period on stormwater topics that are necessary for that employee to do their job, including good housekeeping, IDDE, industrial and HVPs inspections, E&S inspections, Green Infrastructure/Low Impact Development (GI/LID) and pollution prevention procedures. The City shall keep records of the training including the training agenda and/or materials as well as a list of attendees for inclusion in the Annual Report.

#### **8.1.2. Measurable Goals**

- Ensure that appropriate City staff obtain the appropriate stormwater education and training at one Public Works Safety meeting per year.

#### **8.1.3. Schedule**

- Annually, 2017 – 2022: Conduct employee training

#### **8.1.4. Items to be included in the Annual Report**

- Summary of training conducted and attendance during the reporting period. This may include agendas and/or training materials as well as a list of attendees.

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## **9. PUBLIC EDUCATION**

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### *Permit Section 3.3.9: Public Education*

#### **9.1. STORMWATER WEBPAGE**

##### **9.1.1. Description**

The City of Tybee Island has created a webpage on the City's official website that is linked to the home page and contains information on stormwater management issues.

This website will be used to promote the City's and other stormwater-related educational programs, workshops and public meetings. The webpage also includes information on how to prevent stormwater pollution, report illicit discharges and dumping, proper handling and disposal of hazardous wastes, and a number/link to report illegal dumping, illicit discharges and other stormwater problems.

The City will promote this webpage as a part of other public education initiatives. Webpage updates are conducted annually, and a counter will be added to the site to determine how many "hits" the site receives on an annual basis.

##### **9.1.2. Measurable Goals**

- Add a counter to the website to determine how many "hits" the page gets annually by December 2022.
- Maintain and annually update the Stormwater Webpage on the City's website.

##### **9.1.3. Schedule**

- December 2022: Add a Counter to the City's stormwater webpage.
- Annual 2017 – 2022: Update City's stormwater webpage and website.

##### **9.1.4. Items to be Included in Annual Report**

- Snapshot or weblink to the City's stormwater webpage.
- Annual number of "hits" on the webpage.

## **9.2. PUBLIC INFORMATION BROCHURES**

### **9.2.1. Description**

The City will distribute brochures and display posters designed to address stormwater pollution prevention at City Hall. These brochures will be chosen to address one or more of the following topics:

- Stormwater Pollution Prevention
- Good Housekeeping for Commercial Establishments
- Picking Up After Your Pet
- Proper Handling and Disposal of Hazardous Waste
- Septic System Maintenance
- Promotion of Public Involvement Activities
- Rain Barrel Construction

Brochures will be reviewed on an annual basis and new brochures may be chosen and distributed. Brochures will be restocked as they run out. If available, electronic versions of the brochures will be posted on the website. The City will count the number of brochures placed at public locations at the beginning of the permit period and at the end of the permit period to determine the number of brochures that are taken by the public each year. This information will be stored in a spreadsheet that includes the name of the brochure and the number of brochures distributed.

### **9.2.2. Measurable Goals**

- Review brochures on an annual basis
- Restock brochures as they run out

### **9.2.3. Schedule**

- Annual, 2017 – 2022: Review brochures and restock brochure distribution points

### **9.2.4. Items to be included in Annual Report**

- Copies of any brochures distributed during the reporting period
- A spreadsheet containing the names and number of brochures distributed during the year.

### **9.3. BEACH SIGNAGE PROGRAM**

#### **9.3.1. Description**

The City installs and maintains beach signage to encourage residents and visitors to Tybee's beaches to properly dispose of litter and other pollutants. This signage also provides educational information on Tybee's ecosystem and how residents and visitors can protect the environment. The City will continue to annually inspect, maintain, and update signage as needed.

#### **9.3.2. Measurable Goals**

- Inspect, maintain, and update beach signage, as needed.

#### **9.3.3. Schedule**

- Annual, 2017 – 2022: Inspect, maintain, and update beach signage, as needed.

#### **9.3.4. Items to be included in Annual Report**

- Photographs of active beach signage during the reporting period.

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## **10. PUBLIC INVOLVEMENT**

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### *Permit Section 3.3.10: Public Involvement*

#### **10.1. PUBLIC INPUT ON SWMP**

##### **10.1.1. Description**

The City of Tybee Island will invite the public to provide input on the SWMP by posting this document as well as Annual Report on the Stormwater Webpage on the City's website. The webpage will contain a link that will allow the public to submit comments to the City on the best management practices included within the SWMP as well as on the activities summarized in the Annual Report.

##### **10.1.2. Measurable Goals**

- Post the City's most recent SWMP update on the website after its approval by EPD.
- Post each Annual Report on the website after its approval by EPD.

##### **10.1.3. Schedule**

- Annual, 2017 – 2022: Post Annual Report and most recent SWMP Update

##### **10.1.4. Items to be Included in Annual Report**

- Comments received by the City on the SWMP or Annual Report and a description of how they were addressed.

## **10.2. BEACH TASK FORCE**

### **10.2.1. Description**

The City has formed a citizen committee named the Tybee Island Beach Task Force for the purpose of promoting the health and safety and to provide recommendations to the Mayor and Council of the City regarding issues affecting the beach including but not limited to beach erosion and renourishment, and to perform the functions and duties stated herein:

- Promote the beach preservation and maintenance
- Promote beach renourishment
- Promote prevention of shoreline erosion
- Serve as a consultant body on beach and shoreline issues
- Assist other entities in promoting the preservation of the ecology and natural beauty of Tybee Island
- Report on Task recommendations to the Mayor and Council.
- To perform other duties related to the above functions as may be directed by the Mayor and Council or by the City Manager
- Lobby state and federal entities on behalf of Tybee's beaches.

Meetings are open to the public and are held monthly on the 3rd Thursday of each month at the Public Safety Building Conference Room, when there are items for discussion on the agenda. Meetings are posted at City Hall and also on the City website. Agendas are available prior to the meetings. Minutes are available following approval.

### **10.2.2. Measurable Goals**

- At least two meetings of the Beach Task Force per year

### **10.2.3. Schedule**

- Monthly, 2021 – 2022. Convene meetings of the Beach Task Force, as needed.

### **10.2.4. Items to be Included in Annual Report**

- Agendas and minutes for each Beach Task Force meeting.



### **10.3. BEACH CLEAN UP EVENT**

#### **10.3.1. Description**

The City of Tybee Island will work with local groups to organize a clean-up event each year within the City to remove trash and debris from the beach. The City may coordinate this event in conjunction with events such as Tybee Beach Sweep, Great American Cleanup, or with Adopt-A-Stream's Rivers Alive event. The City will work with these organization to choose a location within the City and promote the event through the City's website and/or posters at City facilities. The City will keep records of the number of volunteers that participate as well as an estimate of the amount of trash and debris removed.

#### **10.3.2. Measurable Goals**

- Hold one clean up event per year within the City of Tybee Island

#### **10.3.3. Schedule**

- Annual, 2017 – 2022: Hold clean up event

#### **10.3.4. Items to be Included in Annual Report**

- Records of the number of volunteers that participate
- Estimate of the amount of trash and debris removed

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## **11. POST CONSTRUCTION**

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### *Permit Section 3.3.11: Post-Construction*

#### **11.1. POST CONSTRUCTION STORMWATER CONTROLS**

##### **11.1.1. Description**

The City of Tybee Island has adopted Post Construction Stormwater Controls within its Land Development Code, in Article 16: Stormwater Management Ordinance, Division D: Post Construction Stormwater Management. The performance standards within this ordinance are consistent with the CSS and the City's NPDES Phase I MS4 Permit. The Stormwater ordinance details the rules and regulations governing post-development stormwater management practices for new development and redevelopment. The regulations require performance standards consistent with Section 3.3.11(a)(2) of the Permit for all developments and redevelopments adding or replacing more than 5,000 square feet of impervious surface. This Division also required developments to utilize the standards, criteria, and information presented in the latest edition of the Coastal Stormwater Supplement (CSS), the Georgia Stormwater Management Manual, and any relevant local addenda, for the proper implementation of this division.

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

##### **11.1.2. Measurable Goal**

- Annually evaluate the Tybee Island Stormwater Management Ordinance for post construction stormwater runoff requirements to determine if revisions are required.
- Review site plans for compliance with the Stormwater Management Ordinance, Division D: Post Construction Stormwater Management for development that meets the standard above.
- If and when needed, develop linear project feasibility program to apply to future linear projects.

##### **11.1.3. Schedule**

- Ongoing, 2017 – 2022: Enforce the use of the Stormwater Management Ordinance, Division D: Post Construction Stormwater Management during plan review.
- Annual, 2017 – 2022: Review of Stormwater Management Ordinance, Division D: Post Construction Stormwater Management.
- If and when needed, develop linear project feasibility program, and submit to EPD for approval.

**11.1.4. Items to be included in Annual Report**

- Number of post construction stormwater management plans reviewed and approved during the reporting period.
- If the Stormwater Management Ordinance, Division D: Post Construction Stormwater Management is updated during the reporting period, include the updated ordinance.
- If developed, linear project feasibility program.

## **11.2. GREEN INFRASTRUCTURE/LOW IMPACT DEVELOPMENT (GI/LID)**

*Permit Section 3.3.11: Post-Construction, Table 3.3.11(b)(2)*

### **11.2.1. Legal Authority and Ordinance Review**

#### *11.2.1.A. Description*

City of Tybee has performed an assessment of its existing codes to determine if there are any codes that present an obstacle to GI/LID approach to stormwater management. The City utilized the Code and Ordinance Worksheet developed by the Center for Watershed Protection (CWP). The completed checklist and summary of recommended actions were included in the 2012 Annual Report. Based on the results of the assessment, the Planning and Zoning Department submitted a proposed ordinance change to the City Council to remove an identified obstacle. The City has incorporated the results of this assessment into the LDC.

The City's existing regulations that promote the use of green infrastructure for managing stormwater runoff and mitigating the negative impacts of new development. This code is included below. The City has also adopted a local buffer ordinance for coastal marshlands, and that is included in Appendix B.

#### 3-080(5), PARKING REQUIREMENTS

All newly constructed driveways serving residential units shall be constructed of pervious materials designed to manage stormwater through the prevention of flooding and the degradation of water quality related to stormwater runoff and soil erosion. The designated city official shall approve all porous materials used for single family residences. Replacement of 50 percent or more of an existing driveway will result in the driveway being treated as new construction. All permit applications for pervious driveways will be accompanied by certification from the design professional that the paving material will accommodate, at a minimum, a 25-year 24-hour storm for the area of the driveway. All permit applications for pervious driveways will be accompanied by a maintenance schedule signed and acknowledged by the property owner as described in the Coastal Stormwater Management Manual Supplement.

#### *11.2.1.B. Measurable Goals*

- If additional revisions to the City's Code made to facilitate GI/LID, changes will be submitted to EPD as part of the annual report.

#### *11.2.1.C. Schedule*

- Annual, 2017 – 2022: Review of City Ordinances

#### *11.2.1.D. Items to be Included in Annual Report*

- If updates to the City's Ordinances are made to facilitate GI/LID during the reporting period, include the updated code(s).

### **11.2.2. GI/LID Program**

#### *11.2.2.A. Description*

The City of Tybee Island has developed and implemented a GI/LID Plan to address the following elements of the City's GI/LID program:

1. GI/LID techniques and practices
2. GI/LID structure inventory
3. GI/LID inspection and maintenance program

The GI/LID Plan was submitted to EPD for approval in the 2015 Annual Report. A copy of the GI/LID Plan is included in Appendix G. The City will annually review the GI/LID Program and make changes as needed.

#### *11.2.2.B. Measurable Goals*

- Review the GI/LID Program annual and make updates as needed.

#### *11.2.2.C. Schedule*

- Annual 2017 – 2022: Review GI/LID Program and update as needed.

#### *11.2.2.D. Items to be Included in Annual Report*

- Any updates to GI/LID Program

### **11.2.3. GI/LID Structure Inventory**

#### *11.2.3.A. Description*

The City maintains an inventory of privately-owned non-residential and publicly-owned water quality-related Green Infrastructure (GI) / Low Impact Development (LID) structures located within the City of Tybee Island. The inventory will include at a minimum: bioswales, pervious pavements, rain gardens, cisterns, green roofs, and any other structure deemed appropriate by the City. The inventory is included as an attachment to the GI/LID program, in Appendix G, includes the following information about each structure:

- Type of Structure
- Location of Structure
- Date of Last Inspection

New GI/LID structures will be identified through the plan review process and added to the inventory. An updated inventory will be included with each annual report.

#### *11.2.3.B. Measurable Goals*

- Update the inventory with new GI/LID structures and submit the updated inventory in each annual report.

#### *11.2.3.C. Schedule*

- Annual 2017 - 2022 – Update GI/LID structure inventory

#### *11.2.3.D. Items to be included in Annual Report*

- Most recent GI/LID Inventory

## 11.2.4. Inspection and Maintenance Program

### 11.2.4.A. Description

The City has developed a program to ensure that inspections are conducted on 100% of the privately owned non-residential and publicly owned GI/LID structures within a 5-year period, with at least 5% of structures being inspected in any given year. Maintenance will also be performed on all publicly-owned GI/LID structures, as needed, beginning in June 2017.

The City requires developers of privately-owned non-residential GI/LID structures to complete an Inspection & Maintenance Agreement with the City, prior to the issuance of a permit for any land development activity. The Inspection & Maintenance Agreement, a model of which is included as an attachment to the GI/LID Program in Appendix G, details the following information:

- The person(s) responsible for carrying out the inspection and maintenance.
- A maintenance schedule stating when and how often routine inspection and maintenance will occur.
- Plans for annual inspections to ensure proper performance of the stormwater management system between scheduled maintenance.
- The Inspection & Maintenance agreement and plan is approved by the city and recorded with the deed upon approval of the stormwater management design plan.

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

### 11.2.4.B. Measurable Goals

- Inspect 100% of the total privately owned non-residential and publicly owned GI/LID structures within a five-year period. Provide the number and/or percentage of the total structures inspected during the reporting period in each annual report.
- Ensure that private owners are maintaining privately-owned non-residential GI/LID structures in accordance with their Inspection & Maintenance Agreements.
- Conduct maintenance on all publicly owned GI/LID structures, in accordance with the procedures included in the GSMM and CSS.

### 11.2.4.C. Schedule

- Annual, 2017 - 2022 – Inspect at least 5% of non-residential GI/LID structures.
- Annual, 2017 - 2022 – Inspect and maintain at least 5% of publicly-owned GI/LID structures.

### 11.2.4.D. Items to be Included in Annual Report

- Number and percentage of GI/LID structures inspected during the reporting period

- Number and percentage of publicly-owned GI/LID structures maintained during the reporting period.
- Copies of any Inspection & Maintenance Agreements executed during the permit period.