



# Stormwater Management Plan (SWMP)

City of Tybee Island, GA

MS4 PERMIT #GAS000212

REVISED OCTOBER 2022

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## APPENDICES

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Appendix A Permit

- 1) NPDES Phase I MS4 Permit
- 2) Permit Reapplication

Appendix B Ordinances & Legal Documents

- 1) Canal Maintenance MOU with Unincorporated Chatham County
- 2) Stormwater Management Ordinance/Illicit Discharge Provision
- 3) Tybee Local Design Manual
- 4) Soil Erosion and Sedimentation Control (SE&SC) Ordinance

Appendix C Maps & Inventory

- 1) MS4 Inventory / Maintenance Zone Map
- 2) MS4 Inventory Table
- 3) Municipal Inventory
- 4) Industrial Facility Inventory
- 5) HVPS Inventory
- 6) GI/LID Inventory

Appendix D Inspection Checklists

- 1) GIS Attributes Table Summary
- 2) Detention Pond Inspection Field Form
- 3) Water Quality Vault Inspection Checklist
- 4) Stormwater Inspection Checklist (HVPS, Municipal, Industrial)
- 5) Water Quality Assessment Checklist for Flood Control Structures

Appendix E Illicit Discharge Detection and Elimination (IDDE) Plan

Appendix F Enforcement Response Plan (ERP)

Appendix G Impaired Waters Monitoring and Implementation Plan

Appendix H Green Infrastructure/Low Impact Development (GI/LID) Plan

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## **ACRONYMS/DEFINITIONS**

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BMPs	Best Management Practices
CCRCEC	Chatham County Resource Conservation Education Center
CIP	Capital Improvement Project
CSS	Coastal Stormwater Supplement to the GSMM
DoA	Georgia Department of Agriculture
DPW	Tybee Island Department of Public Works
E&S	Erosion & Sedimentation
EPD	Georgia Environmental Protection Division
ERP	Enforcement Response Plan
ESPCP	Erosion & Sedimentation Control Plan
GESA	Georgia Erosion & Sedimentation Act
GI	Green Infrastructure
GIS	Geographic Information System
GSMM	Georgia Stormwater Management Manual
GSWCC	Georgia Soil & Water Conservation Commission
HVPS	Highly Visible Pollution Source
IDDE	Illicit Discharge Detection and Elimination
IGP	Industrial General Permit
LDA	Land Disturbance Activity
LEED	Leadership in Energy and Environmental Design
LIA	Local Issuing Authority
LID	Low Impact Development
MOU	Memorandum of Understanding
MS4	Municipal Separate Storm Sewer System
MSDS	Materials Safety Data Sheet
NPDES	National Pollutant Discharge & Elimination System
PFH	Pesticides, Fertilizers & Herbicides
POC	Pollutant of Concern
ROW	Right-of-Way
SWMP	Stormwater Management Program
SWP3	Stormwater Pollution Prevention Plan

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## **EXECUTIVE SUMMARY**

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The City of Tybee received renewed coverage under the 2022 – 2027 National Pollutant Discharge and Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) Permit (GAS000212) on April 12, 2022, as required by provisions of the Georgia Water Quality Control Act and the Federal Clean Water Act. A copy of the City’s Permit Reapplication form to renew coverage under this permit and a copy of the City’s 2022 – 2027 MS4 Permit is provided in Appendix A. This permit requires the development of a Stormwater Management Program (SWMP), to address the following program elements:

- Structural and Source Control Measures
- Illicit Discharge Detection and Elimination
- Industrial Facility Stormwater Discharge Control
- Construction Site Management
- Highly Visible Pollutant Sources
- Enforcement Response Plan
- Impaired Waters
- Municipal Employee Training
- Public Education
- Public Involvement
- Post Construction
- Green Infrastructure/ Low Impact Development

The stormwater management program described within this document demonstrates the commitment of the City of Tybee to water resources protection and implementing a permit-compliant stormwater management program.

### **SWMP IMPLEMENTATION RESPONSIBILITY**

The City of Tybee shares responsibility for BMP permit implementation with one other entity. Unincorporated Chatham County performs routine canal maintenance on larger canals throughout Tybee in accordance with its MOU with the City, a copy of which has been 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 STRUCTURE INVENTORY AND MAP

#### 1.1.1. Description

The City of Tybee'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 (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 stormwater runoff and is not a combined sewer or part of a Publicly Owned Treatment Works."*

Tybee's stormwater system is comprised of the following structures that are regulated by the City's MS4 Permit:

- Catch Basins
- Pipes/Storm Drain Lines
- Ditches
- Municipal Detention / Retention Ponds
- Water Quality Vaults

The City of Tybee 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:

- Update the inventory and map each reporting period.
- Include the number and/or length of MS4 structures (catch basins, ditches, pipes/storm drain lines, detention/ retention ponds, and water quality vaults) added or deleted during the reporting period and the total number and/or length of structures in the inventory.

**1.1.3. Schedule**

- Annually, 2022 – 2027.

**1.1.4. Annual Report Documentation:**

- An updated inventory and map of MS4 structures, including the number and/or length of MS4 structures added or deleted during the reporting period and the total number and/or length of structures in the inventory.



## 1.2. MS4 INSPECTION AND MAINTENANCE PROGRAM

### 1.2.1. Description

#### Inspection Procedures

The City will inspect 100% the MS4 features identified within the MS4 inventory over the five-year period of this permit, with at least 5% of MS4 structures inspected each year. The City will visually inspect the MS4 within each maintenance zone in accordance with the following procedures:

- Inspections will generally include a visual condition assessment of the various system elements including catch basins, storm drain lines, ditches, and visible areas of stormwater controls (i.e. detention/retention ponds and water quality vaults).
- Storm drain lines will be visually inspected where they outfall into a structure or open drainage way, unless access is restricted due to obstructions.
- Visible areas of stormwater quality vaults, such as where stormwater enters or outfalls, will be visually inspected; underground components that are not visible without entry will not be inspected.
- Inspections will be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer.
- A table listing the information that will be collected and documented during site inspections within a GIS database is provided in Appendix D.

#### Maintenance Procedures

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:

- If maintenance is required, the City will determine if the maintenance need is structural (i.e., the structure needs to be repaired or replaced); or if the maintenance need is routine (i.e., sediment needs to be cleared, debris removed, or vegetation trimmed back).
- Sediments will be removed before 50% of the capacity of the structure has been lost (see Table 1 below for reference).
- The City will also decide if the maintenance need should be prioritized for more immediate action, (i.e., malfunction or failure of the system is possible if the maintenance need is not addressed).
- The City will schedule appropriate maintenance as needed and in accordance with available City resources and standard procedures.
- All stormwater management structures will 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 (CSS) and Georgia Stormwater Management Manual (GSMM).

- Materials removed from the MS4 during maintenance will be disposed of properly, in accordance with applicable Federal and State laws.

**TABLE 1: MS4 INSPECTION & MAINTENANCE CRITERIA**

Structure	STANDARD FOR MAINTENANCE
Catch Basins	Sediment fills up to the lowest invert
Ditches	50% filled with sediment
Piped Storm Drain Lines	50% filled with sediment
Detention Ponds	50% filled with sediment
Water Quality Vault	50% filled with sediment

Chatham County will inspect and maintain 0.59 miles of canals within Tybee’s municipal limits. This responsibility has been formally established through the 2020 Intergovernmental Agreement, as described in the SWMP Implementation Responsibility Section on Page 1 of this plan. This agreement is included in Appendix B, and it outlines the canal maintenance procedures.

**1.2.2. Measurable Goals**

- Conduct inspections of the MS4 structures within one maintenance zone per year so that 100% of the structures are inspected within the five-year permit period, with a minimum of 5% of inspections occurring each reporting period.
- Conduct maintenance on MS4 structures as needed.

**1.2.3. Schedule**

- Annually, 2017-2022.

**1.2.4. Annual Report Documentation:**

- Summary of MS4 Inspections including the number and percentage of total structures inspected during the reporting period.
- Documentation of inspections conducted, such as a table of individual inspection reports with a record for each structure inspected, and the findings of that inspection.
- Number and/or length and percentage of MS4 structures maintained.
- Documentation of maintenance conducted during the reporting period, such as copies of work orders and/or summary of maintenance activities.

### **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 updated its Comprehensive Plan in 2016 and a 2021-2026 Comprehensive Plan update was prepared in 2021. The City's Plans can be viewed at <https://www.cityoftybee.org/345/Master-Plan> and copies are provided in Appendix B.

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

The City will review and update the Comprehensive Plan as needed each reporting period.

##### *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. A copy of the Carrying Capacity Study is provided in Appendix B.

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.

**1.3.2. Measurable Goals**

- Review and update the Comprehensive Plan as needed.

**1.3.3. Schedule**

- Annually, 2022 – 2027.

**1.3.4. Annual Report Documentation**

- Description of any changes made to the Comprehensive Plan.

## **1.4. STREET MAINTENANCE**

### **1.4.1. Description**

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

The City of Tybee implements a street sweeping program to reduce polluted runoff originating from streets with curb and gutter systems. The street sweeper is typically operated every Monday and Friday along streets and in public parking lots. Streets and public parking lots are also swept after heavy storms and special events. Debris picked up is collected at the Department of Public Works and hauled to the landfill by the City's waste management contractor. 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.

The City will continue to perform routine street sweeping activities for curb and gutter roads, with a minimum of at least 25 miles swept during each reporting period. Records of street sweeping activities will be maintained by the City and submitted in the Annual Report.

#### *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 currently maintains approximately 1.7 miles of roadside ditches.

- Right-of-ways are mowed routinely during the growing season (typically bi-monthly), and ditches are inspected at that time.
- Litter and debris are removed prior to mowing and disposed of at a local landfill.
- 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.
- Roadside ditch inspection and maintenance activities are recorded in Monthly Status Reports.

#### *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 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 road construction projects where appropriate.

#### **1.4.2. Measurable Goals:**

- Perform routine street sweeping activities for curb and gutter roads, with a minimum of at least 50 miles swept during the reporting period.
- Maintain roadside ditches annually through mowing and litter removal activities.
- Service garbage cans in the ROW on a weekly basis.

#### **1.4.3. Schedule**

- Annually, 2022 – 2027.

#### **1.4.4. Annual Report Documentation**

- Provide documentation of street sweeping activities, including length of streets swept.
- Provide documentation of roadside ditch maintenance activities, including length of ditches cleaned 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. *New/Proposed Flood Management Projects*

The City of Tybee currently requires developers to comply with the City's Stormwater Management Ordinance, 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 latest edition of the CSS, 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 Planning and Zoning Department before a land disturbing activities (LDA) Permit is issued and construction can begin.

The City will ensure that all new/proposed flood management projects are assessed for water quality impacts during the design phase. For the purposes of this BMP, the City interprets "Flood Management Projects" to refer to detention/retention ponds and water quality vaults. All new developments will be required to comply with the City's Post-Construction Runoff Control requirements addressed in the Stormwater Management Ordinance, which require that stormwater management controls address water quality as well as water quantity protection.

#### 1.5.1.B. *Existing Flood Management Projects*

The City developed Water Quality Assessment Procedures to ensure that existing City-owned flood management projects (i.e., detention/retention ponds and water quality vaults) are assessed for potential retrofitting to address water quality impacts. These Procedures were approved by the Georgia EPD during the last permit period for other coastal MS4s and meet the requirements of the City's new MS4 permit. The City's Water Quality Assessment Procedures for Existing Flood Management Projects are provided in Appendix D.

The City or a third-party contractor will perform Water Quality Assessments for 100% of all City-owned detention / retention ponds and water quality vaults during the 5-year permit period to assess the potential to retrofit these publicly-owned structures to incorporate additional control measures to improve water quality treatment. If more than five flood management structures are listed on the inventory, the City will inspect at least one of the flood management structures annually. If, however, an assessment was previously performed on an existing flood management structure using the 2016 GSMM, prior to the effective date of this permit, then an additional assessment does not need to be performed. Inspections of flood management

structures will be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and recorded within the City's GIS layer or using a paper checklist. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist are provided in Appendix D.

Retrofitting activities will be conducted as funding becomes available for their implementation. If retrofitting activities are conducted during the reporting period, the City will maintain documentation showing the status of the retrofitting and information about what retrofitting activities were conducted.

**1.5.2. Measurable Goal:**

- a. Ensure 100% of new/proposed flood management projects (i.e., detention/retention ponds and water quality vaults) comply with the City's Stormwater Management Ordinance.
- b. Perform Water Quality Assessment for 100% of City-owned detention / retention ponds and water quality vaults within the 5-year permit period (unless a previous assessment was conducted using the 2016 GSMM and the City has documentation, in which case the assessment does not need repeated).
- c. Evaluate potential retrofitting, if applicable and as funding permits.

**1.5.3. Schedule**

Annually, 2022 – 2027.

**1.5.4. Annual Report Documentation**

- Number of plans reviewed where new/proposed flood management projects were assessed for water quality impacts during the reporting period.
- Documentation all water quality assessments of existing flood management control structures that occurred during the reporting period and status of any retrofitting activities.
- Documentation of any water quality assessments conducted prior to April 12, 2022 of existing flood management control structures and status of any retrofitting activities (with the 2022 – 2023 Annual Report).
- For each reporting period after 2022-2023, a table listing the date and results of the assessment and the status of any retrofitting activities.



## **1.6. MUNICIPAL FACILITIES**

### **1.6.1. Description**

Tybee has developed a municipal facility inventory to document the location of each facility owned and/or maintained by the City with the potential to cause pollution, excluding any facilities that are addressed in Section 3.3.3 (Industrial Facilities). The inventory includes any municipal facilities owned by the City that are located in another jurisdiction that have the potential to cause pollution, if applicable. A copy of the City's Municipal Facility Inventory is provided in Appendix C. Currently, the City has two facilities listed on the Municipal Facility Inventory:

- Wastewater Treatment Plant (WWTP)
- Public Works Site

The City will update its Municipal Facility Inventory at least annually and City staff or their designated representatives will inspect 100% of inventoried municipal facilities within the 5-year permit period (at least one inspection will be conducted each reporting period). If more than five (5) municipal facilities are listed on the inventory, the City will inspect at least 5% of the municipal facilities annually. Inspections of Municipal Facilities will typically be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer. For City staff that do not have the field collection application available and/or in situations when a field collection application cannot be used for other reasons, a paper copy version of the inspection checklist will be used to record the inspections. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist are provided in Appendix D.

If sites with needed improvements are identified, the appropriate department will be notified of the problem and a site re-inspection may be performed if deemed necessary. Records will be maintained on problems found and actions taken.

### **1.6.2. Measurable Goals**

- Update municipal facilities inventory annually.
- Inspect 100% of inventoried facilities every 5 years, with at least one inspection conducted annually. If there are more than five (5) municipal facilities on the inventory, 5% of the municipal facilities will be inspected annually.
- Document inspections on the Stormwater Site Inspection Checklist.

### **1.6.3. Schedule**

- Annually, 2022 – 2027.

#### **1.6.4. Annual Report Documentation**

- Copy of updated municipal facility inventory.
- Documentation of inspections conducted, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed inspection checklist for each municipal facility inspected during the reporting period.
- Summary and/or documentation of any activities conducted to address issues identified during the site inspection.

## 1.7. PESTICIDE, FERTILIZER, & HERBICIDE (PFH) APPLICATION

### 1.7.1. Description

#### 1.7.1.A. *Commercial Pesticide Applicator & Distributor Certification Program*

Tybee relies on the Georgia Department of Agriculture (DoA) to address requirements for Pesticide Applicator/Distributor Training and Certification. The DoA requires commercial applicators of restricted use pesticides (including herbicides, insecticides, fungicides, plant growth regulators, and defoliant) to obtain and retain a “Commercial Pesticide Applicators License.” The DoA also requires that distributors of restricted use pesticides obtain and retain a “Pesticide Dealer’s License.” Continuing education units are required each year to maintain the license.

Prior to issuing a business license, the City 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 PFH Program*

The City does not store, use or apply any restricted-use PFHs and does not contract with a 3rd-party for any chemical applications at the City. Therefore, the City is not subject to the DoA requirements for restricted-use PFHs and is not required to maintain an inventory, conduct specific training and staff do not need to obtain DoA certifications (such as an applicator’s license).

The City has proactively opted to maintain a chemical inventory of PFHs that may be purchased over-the counter (i.e., referred to herein as “general-use” PFHs that are not restricted-use) and used on an as-needed basis by City staff; a copy of the City’s general-use PFH chemical inventory is included in Appendix C. The City has also prepared a PFH Standard Operating Procedure (SOP) that lists operational best management practices (BMPs) developed to minimize or prevent the discharge of chemicals into the City’s stormwater drainage system by promoting proper storage and application of general-use PFHs during landscape maintenance activities. This SOP would also be utilized if the City were to store, use or apply restricted-use PFHs in the future. The City discusses these standard operating procedures during staff meetings and during annual refresher training. The procedures listed below are critical steps that must be included in every landscape maintenance activity that includes chemical application to either control weeds and pests or to provide adequate fertilization.

The City's SOP for PFH application is as follows (and a copy is also provided in Appendix D):

1. Conduct chemical application only during days when it is not windy or raining, and when rain is not predicted in the immediate forecast.
2. Consult the Material Safety Data Sheet (MSDS), if available, or package directions for each chemical to ensure all storage, handling, and application precautions are taken.
3. Follow label directions when storing, handling, mixing, recycling and disposing of chemicals and empty containers; properly calibrate application equipment, if applicable, to ensure proper amount of chemicals are applied.
4. DO NOT transfer, pour or dispose of chemicals outdoors, near or in storm drains, or drainage areas; transfer over impervious surface so spills can't seep into ground.
5. Have spill cleanup materials available and ready to go in case of spill; clean up chemical spills promptly, with DRY methods, if possible.
6. When watering landscaped area after fertilizer application, take care to not allow water to runoff into streets or other conduits to waterways.
7. Recycle or dispose of all spent or excess chemicals properly and promptly.
8. Keep all PFHs in leak proof shelters away from elements to help prevent contamination of the stormwater system.
9. Keep unused containers closed tightly; use a tight fitting lid; label containers.
10. Comply with the GDoA Program, as needed and appropriate, with regards to training and certification of staff. A Commercial Pesticide Applicator License may be required for City employees that apply restricted use pesticides (i.e., pesticides that are not available to the general public).

The City also commonly uses native/low maintenance/drought tolerant vegetation for landscaping public areas and along roadways. The few chemicals that the City does use are stored in a locked and covered shed at the Department of Public Works to prevent contact with precipitation and minimize the potential for stormwater pollution.

**1.7.2. Measurable Goals:**

- Continue to utilize GDoA Program to certify commercial applicators and distributors within the City.
- Continue to adhere to the PFH Chemical Application SOP above when performing any landscape chemical application within the City.

**1.7.3. Schedule:**

- Ongoing, 2022-2027.

**1.7.4. Annual Report Documentation:**

- Documentation of any program activities conducted during the reporting period related to the chemical application of PFHs.

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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. A copy of the ordinance is provided in Appendix B.

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

- Annually evaluate the Illicit Discharge and Illicit Connection provision of the City's Stormwater Management Ordinance to determine if revisions are required.

#### **2.1.3. Schedule**

- Annually, 2022 - 2027.

#### **2.1.4. Annual Report Documentation**

- 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 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 and inventory to reflect the addition of outfalls from new infrastructure projects or developments and remove any outfalls that have been reclassified or removed.

### **2.2.2 Measurable Goals**

- 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.
- Maintain and update a database inventory of all outfalls from the MS4 within the City limits of Tybee.

### **2.2.3 Schedule**

- Annually, 2022-2027

### **2.2.4 Annual Report Documentation**

- Updated inventory and map of the MS4 outfalls that identifies 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**

Tybee's IDDE Plan consists of a "wet" and "dry" MS4 outfall inventory and map; outfall reconnaissance inventory and field screening procedures (i.e., dry weather screening); a proactive IDDE inspection program; source tracing through field sampling, visual inspections, site inspections, upstream sampling, and/or dye testing; source removal; and data collection and reporting. The IDDE Plan, included in Appendix E of this Plan, will be used to determine if upstream facilities/connections are discharging non-stormwater flows to the drainage system and to eliminate all identified illicit discharges. An Outfall Reconnaissance Inventory Form and Source Tracing Form are provided in Appendix B of the IDDE Plan.

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 City's Stormwater Management Ordinance, IDDE Plan, and Enforcement Response Plan (ERP) to remove positively identified illicit discharges. A copy of the City's ERP is included in Appendix F.

The City will screen at least 5% of the total number of stormwater outfalls listed on the City's most current each reporting period and 100% of the inventory of MS4 outfalls will be screened over the 2022-2027 five-year period.

### **2.3.2. Measurable Goals**

- Dry weather screen 100% of all MS4 outfalls over a five-year period with at least 5% of listed stormwater outfalls screened each reporting period.
- Investigate and perform source tracing for 100% of suspected illicit discharges.
- Enforce the Illicit Discharge prohibition of the Stormwater Management Plan, IDDE, and ERP for 100% of positively identified illicit discharges.

### **2.3.3. Schedule**

- Annually, 2022-2027: Dry weather screen outfalls
- Ongoing, 2022 – 2027: Perform source tracing as needed
- Ongoing 2017 – 2022: Enforce Illicit Discharge provision of the Stormwater Management Ordinance as needed.

### **2.3.4. Annual Report Documentation**

- Number and percentage of MS4 outfalls inspected during the reporting period.



- Documentation of inspections and dry weather screening, such as a table of individual inspection reports with a record for each outfalls inspected and the findings of that inspection, or a copy of the completed dry weather screening forms (Outfall Reconnaissance Inventory Form) for all MS4 Outfalls screened within the reporting period.
- Records of any source tracing or enforcement activities conducted as a result of dry weather screening activities.

## **2.4. SPILL RESPONSE PROCEDURES**

### **2.4.1. Description**

The City's Public Works Department and Fire Department maintains spill response materials onsite to respond to and cleanup minor spills at municipal facilities and checks for spill kits and spill response materials when conducting inspections of Highly Visible Pollutant Source (HVPS) facilities and Industrial facilities. Public Works Department staff are also responsible for reporting cleanup of sanitary sewer spills.

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**

- Annually, 2022 - 2027.

### **2.4.4. Annual Report Documentation**

- Documentation on any spill occurrences and cleanup performed.

## **2.5. PUBLIC REPORTING PROCEDURES**

### **2.5.1. Description**

The City of Tybee maintains a link on the City's official website that allows citizens and visitors to report concerns thru SeeClickFix, including illicit discharges and illegal dumping. The link is accessible directly from the City's stormwater webpage as well as from the City's main City website. The City's website also provides a telephone phone number (912-786-4573) to contact the City for any purpose, including a request for service and/or report illicit discharges to the stormwater system. The City promotes the stormwater webpage and ability to report concerns and questions thru SeeClickFix as a part of other public education initiatives.

The City of Tybee Island has established procedures for encouraging and addressing citizen complaints about water quality. If complaints or concerns are submitted thru SeeClickFix or called in to the City, City Hall and/or Department of Public Works (DPH) staff will assign the complaint/issue to the correct department and enter information about the complaint or concern into PubWorks, the software management program used by the City. The Tybee Island Police Department manages complaint calls after hours and directs the complaint to an on-call operator.

DPW is responsible for taking action to address calls and electronic complaints that are related to stormwater issues and other activities overseen by their department. Actions taken by Public Works may include visual inspections, field screening, line televising, and dye testing, or contacting another agency to investigate. Tasks are typically completed within three (3) to five (5) business days of initial complaint receipt, and issues that pose a more urgent threat to water quality are prioritized for earlier investigation and follow-up as needed. Any required action for repair or maintenance is dependent on the character of the discovery and determination of field conditions. PubWorks is used to track actions taken and the status of citizen complaints received related to potential illicit discharges, illegal dumping, and other water quality violations

### **2.5.2. Measurable Goals**

- Investigate 100% of all water quality complaints received.
- Take appropriate action for 100% of complaints requiring action.
- Record IDDE complaints and actions taken in the City's Work Order Database (PubWorks).

### **2.5.3. Schedule**

- Ongoing, 2022 – 2027: Update Work Order Database (PubWorks) as calls are received.
- Ongoing, 2022 – 2027: Take action for complaints received, as appropriate.
- Annually, 2022 – 2027: Ensure stormwater webpage lists proper telephone number and contains a working link for electronic reporting of stormwater issues.

#### **2.5.4. Annual Report Documentation**

- Documentation of citizen complaints, investigations, actions taken during the reporting period, and status of the complaint.

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

### 2.6.1. Description

The City ensures that used oil generated by the City's auto fleet is managed properly by collecting the used oil and sending it offsite for recycling. The City also performs multiple activities to promote the proper management and disposal of used oil and toxic materials by the public. Activities currently conducted include:

- The City maintains a link on the City's Stormwater webpage to the Chatham County Resource Conservation Education Center (CCRCEC). <https://www.cityoftybee.org/357/Storm-Sewer-Drainage>. This site provides information on its website to help citizens of the County, including those in Tybee, to dispose of hazardous and nonhazardous household wastes properly, including a listing of facilities and businesses that will accept waste oil, other toxic wastes, and recyclables from the general public. The link can be found at the City's following web address: <http://www.gardencity-ga.gov/for-residents/sanitation-information>.
- The City's Stormwater webpage features downloadable electronic educational brochures that provide information about proper waste management & disposal of hazardous household wastes and other wastes commonly generated by automobile maintenance, gas stations, and restaurants & food service entities. Educational materials are also maintained at City Hall that often provide guidance about proper waste management storage and disposal practices.
- The City maintains multiple webpages that provide detailed information about the City's single stream recycling program and how to recycle electronic wastes, glass, plastic and other wastes. In addition, Fight Dirty Tybee, a volunteer organization affiliated with the City, also maintains an active internet presence thru its website & social media page to discourage littering and educate the community about beach cleanups, ways to recycle a wide variety of wastes (including many hard-to-recycle waste streams), and keep the public updated on current activities and opportunities for public involvement as well as education.
- Tybee maintains an inventory of commercial businesses and facilities that are considered to be HVPs as well as industrial sites. HVPs and industrial facilities are routinely inspected by the City, and industry-specific educational literature, including literature about proper waste management and disposal, is supplied at the time of the site inspection or as part of the follow-up to the site inspection on an "as-needed" basis.

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

- Promote proper management and disposal of used oil and toxic materials by maintaining a web link to the CCRCEC website on the City's stormwater page.
- Provide industry-specific educational literature, including literature about proper waste management and disposal, during HVPS and Industrial Site inspections on an "as-needed" basis or by posting the educational materials online.

### **2.6.3. Schedule**

- Ongoing, 2022 – 2027.

### **2.6.4. Annual Report Documentation**

- Details of any activities performed during the reporting period including screenshot and web link for the CCRCEC.
- Summary of and/or copies of industry-specific educational literature, including literature about proper waste management and disposal, distributed during HVPS and Industrial Site inspections.

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

### **2.7.1 Description**

The City of Tybee maintains the sanitary sewer system by performing a multitude of activities designed to maintain the integrity of the sanitary sewer system and prevent seepage and spillage of sanitary sewer wastes. The City also 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. 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 routine visual inspections of its lift stations (typically daily) 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.

The City will continue lift stations inspections (at least weekly if not more often) during the reporting period to prevent seepage and spillage of sanitary sewer wastes, and maintain documentation for the City's Annual Report.

### **2.7.2 Measurable Goal:**

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

### **2.7.3 Schedule**

- Ongoing, 2022 – 2027.

### **2.7.4 Annual Report Documentation**

- Documentation of sewer main chemical treatment.
- Documentation of sanitary sewer spills and cleanup activities performed.

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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 currently maintains an Industrial Facility Inventory. This inventory is based on a database posted on the Georgia EPD's website about facilities that have applied for coverage under the Industrial Storm Water General Permit (IGP) and/or submitted a No Exposure Exclusion (NEE) for permit exemption. Each reporting period, Tybee reviews the most recent listing of industrial sites posted to EPD's website and updates the Industrial Facility Inventory accordingly.

#### **3.1.2 Measurable Goals**

- Annually review EPD database of industrial facility permittees and update Industrial Facility Inventory.

#### **3.1.3 Schedule**

- Annually, 2022 – 2027.

#### **3.1.4 Annual Report Documentation**

- Copy of updated Industrial Facility Inventory.



## 3.2 INDUSTRIAL STORMWATER INSPECTION PROGRAM

### 3.2.1 Description

The City of Tybee will inspect 100% of the facilities listed on the City's Industrial Facility Inventory over the course of the five (5) year permit period (2022 – 2027), with a minimum of at least one industrial inspection conducted each reporting period. If more than five (5) industrial sites are listed on the City's inventory, the City will inspect a minimum of 5% of the industrial facilities each year.

- 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 will 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).
- Industrial site inspections will typically be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer.
- For City staff that do not have the field collection application available and/or in situations when a field collection application cannot be used for other reasons, a paper copy version of the inspection checklist may be used to record the inspections. The field collection application and paper inspection checklist contain the same questions.
- A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist is provided in Appendix D.
- Should an inspection reveal a potential threat to water quality in the MS4, Tybee staff will notify the industry or business, provide them with a copy of the inspection checklist and/or relevant information. If deemed necessary, the City will later 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 Stormwater Management Ordinance and Enforcement Response Plan.
- If the violation is not corrected, EPD will be notified of the problem. The City will also notify EPD if assistance is needed for enforcement of the NPDES IGP or if there is a threat to Waters of the State. The City of Tybee may elect to perform water quality monitoring to monitor stormwater runoff and/or use monitoring data provided by the industrial facility in order to secure evidence to support the alleged violation.
- The City will maintain records of inspections results, problems found, and actions taken.

### **3.2.2 Measurable Goals**

- Inspect 100% of industrial facilities in the City’s inventory over the 5-year permit period. Inspect at least one industrial site each reporting period, or, if there are more than five sites listed on the City’s inventory, inspect at least 5% of the industrial facilities in the inventory annually.
- Document site inspections and recommended corrective actions/violations.
- Enforce the Stormwater Management Ordinance, IDDE Plan, and ERP as needed.
- Conduct water quality monitoring at industrial facilities if deemed necessary by the City and/or obtain water quality monitoring data from the industrial facility.

### **3.2.3 Schedule**

- Annually, 2022 – 2027.

### **3.2.4 Annual Report Documentation**

- Documentation of inspections, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed site inspection checklist for each Industrial facility inspected during the reporting period and any available follow-up documentation.
- Number and percentage of facilities inspected.
- Water quality monitoring results, if monitoring is conducted.

### **3.3 ENFORCEMENT PROCEDURES**

#### **3.3.1 Description**

If an illicit discharge is identified during an industrial site inspection, the City will initiate enforcement procedures as outlined in the City's Enforcement Response Plan (Appendix F) and maintain documentation.

If an illicit discharge has not taken place but practices onsite indicate a high probability that such a discharge could occur, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection and recommend corrective actions to address the potential issue. The City will also make the owner/operator aware of the Georgia Stormwater Management Manual and the Coastal Stormwater Supplement, which address pollution prevention and good housekeeping practices.

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

- Implement enforcement procedures when illicit discharge violations are discovered during inspections of industrial facilities.
- Document enforcement actions taken in violation/enforcement action log and/or other appropriate written documentation (letter to facility, copy of warning and/or Notice of Violation, etc.).

#### **3.3.3 Schedule**

- Ongoing, 2022 – 2027.

#### **3.3.4 Annual Report Documentation**

- Documentation of enforcement actions taken during the reporting period.

## **3.4 EDUCATIONAL ACTIVITIES**

### **3.4.1 Description**

The City performs multiple educational activities that target industrial operations/industrial facilities, including:

- When performing site inspections, City staff will have a face-to-face meeting with the manager or staff member during or immediately following a site inspection (if possible) to provide information and tips on pollution prevention control measures at their facility and proper materials/waste storage practices.
- City staff will distribute educational materials during site inspections, and provide educational materials with site inspection letters or other written information that may be sent to a site after the site inspection is completed. Based on the type of facility and operations, City staff select appropriate handouts and brochures from this collection to distribute to facility personnel, such as the the Georgia EPD's informational handout on the requirements of the NPDES IGP, Standard Industrial Classification Codes that subject facilities to permitting requirements, and/or other relevant stormwater best practices educational information to industrial facilities during industrial stormwater site inspections.
- The City's Stormwater webpage (<https://www.cityoftybee.org/357/Storm-Sewer-Drainage>) features downloadable electronic educational brochures that provide information about proper waste management & disposal of hazardous wastes for residential, commercial and industrial operations. The Stormwater webpage also includes a link to the Chatham County Resource Conservation Education Center website which provides additional information regarding how to properly dispose of hazardous waste and used oil, as well as other common "hard to recycle" wastes. This website includes a listing of facilities and businesses that will accept waste oil, toxic wastes, and recyclables from the general public, including the City of Tybee residents and businesses. During and /or after site inspections, the City may direct local businesses that are inspected to the City's stormwater webpage to ensure facility personnel are familiar with the educational materials and resources available to them on the City's webpage.
- Educational brochures are often available for pickup at City Hall or handed out at City events that contain relevant information for business owners as well as citizens.

### **3.4.2 Measurable Goals**

- Provide educational information to facilities during industrial site inspections.

### **3.4.3 Schedule**

- Annually, 2022 – 2027.

### **3.4.4 Annual Report Documentation**

- 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: Industrial Facility Stormwater Discharge Control, Table 3.3.4*

### **4.1 LEGAL AUTHORITY**

#### **4.1.1 Description**

The City of Tybee has established legal authority to require and enforce appropriate erosion and sediment controls by adopting the State model Soil Erosion, Sedimentation and Pollution Control Ordinance (E&S Ordinance) that reflects the most recent amendments to the Georgia Erosion and Sedimentation Act (GESA). This ordinance, which was last updated in December 2016, can be found in Article 15 of the Tybee Island Land Development Code and a copy is provided in Appendix B. The City will review the E&S ordinance annually and make revisions as needed to ensure appropriate erosion and sediment controls are in place at construction sites.

The City of Tybee is currently a local issuing authority (LIA) for land disturbance activity (LDA) Permits as defined by GESA. Accordingly, the City administers the procedures 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.

#### **4.1.2 Measurable Goals**

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

#### **4.1.3 Schedule**

- Annually from 2022 – 2027: Annual Review of E&S Ordinance.

#### **4.1.4 Annual Report Documentation**

- If revisions are required, submit a copy of the updated E&S 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 obtain an LDA Permit.

The City's Erosion and Sedimentation (E&S) Ordinance requires submittal of an approved Erosion, Sedimentation, and Pollution Control Plan (ESPCP) prior to issuance of an LDA Permit. ESPCPs received by Tybee are forwarded to the Georgia Soil and Water Conservation District (GSWCD) who review the plans for compliance with the requirements of GESA and the Georgia Erosion and Sedimentation Control Manual. The ESPCP must be approved by the GSWCC prior to issuance of an LDA Permit by the City.

### **4.2.2 Measurable Goals**

- Provide 100% of ESPCPs to GSWCD for their review and approval of compliance with GESA and the Tybee E&S Ordinance.
- Grant LDA permits only after ESPCP is approved by GSWCD.
- Maintain a Site Plan Review database that summarizes the site plans received and the number of site plans reviewed, approved, or denied and the number of LDA permits issued during the reporting period.

### **4.2.3 Schedule**

- Ongoing, 2022 – 2027: Review ESPCPs as they are submitted.
- Annually, 2022-2027: Prepare and submit Site Plan Review database.

### **4.2.4 Annual Report Documentation**

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

## **4.3 CONSTRUCTION SITE INSPECTION PROCEDURES**

### **4.3.1 Description**

The Tybee Planning and Zoning 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. The City inspects construction sites in accordance with the following procedures:

- 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 inspected by the City on a regular basis until the site is stabilized, with at least one inspection occurring during the reporting period.
- Inspections during the construction process will be prioritized as follows:
  - Proximity to local waterways
  - A significant rain event
  - Evidence of poor housekeeping
  - History of poor compliance
  - Evidence of absent or malfunctioning controls
- 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. A copy of the checklist is provided in Appendix D. A checklist is used so that all inspections are uniform, and also to provide the City and the Permit holder with a written record of the inspection findings.

### **4.3.2 Measurable Goals**

- Inspect active construction sites with an LDA after installation of initial BMPs, during active construction, and after final site stabilization with at least one site inspection of each active site occurring during the reporting period.
- Complete and maintain E&S Inspection Checklists.
- Maintain a list of active construction sites.

#### **4.3.3 Schedule**

- Ongoing, 2022-2027: Inspect and document active construction sites.
- Annually, 2022-2027: Prepare and submit list of active construction sites.

#### **4.3.4 Annual Report Documentation**

- List of active construction sites, including the number and dates of inspections conducted at each site. (All completed E&S checklists are maintained on file and can be provided upon request.)



## **4.4 ENFORCEMENT PROCEDURES**

### **4.4.1 Description**

If a site is found to be in violation of the City's ordinance during inspection, 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.

Following 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 an LDA
- 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.

A detailed description of enforcement procedures regarding E&S violations is included in the City's E&S Ordinance in Appendix B as well as the ERP in Appendix F.

### **4.4.2 Measurable Goals**

- Implement enforcement actions for 100% of identified violations in accordance with E&S Ordinance and ERP.
- Provide a log of all violations and enforcement procedures undertaken during the reporting period, including the number and type (e.g. Notice of Violation, Stop Work Order), status (e.g. pending, resolved), and amount of any assessed penalties.

### **4.4.3 Schedule**

- Ongoing, 2022–2027.

### **4.4.4 Annual Report Documentation**

- Documentation of enforcement actions taken during the reporting period including the number, type, status and amount of assessed penalties.

## **4.5 CERTIFICATION**

### **4.5.2 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 and maintain active certifications.

### **4.5.3 Measurable Goals**

- Provide all City employees involved in the E&S Program with applicable E&S training and certification .
- Ensure all construction site operators with LDP permits have applicable E&S certification .

### **4.5.4 Schedule**

- Ongoing, 2022-2027.

### **4.5.5 Annual Report Documentation**

- Documentation of current GSWCC 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 Pollutant Sources (HVPS), 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). A copy of the City's most current HVPS inventory is provided in Appendix B. For the 2022 – 2027 permit period, the City considers the following types of businesses to be HVPS:

- Auto Repair/Maintenance Facilities
- Gas Stations
- Car Washes
- Landscape and Garden Related Businesses
- Trucking/ Warehousing Facilities (Not listed as Industrial)
- Manufacturing/Assembly Facilities (Not listed as Industrial)

The City's HVPS inventory is reviewed and updated each reporting period based on changes to the business license database.

#### **5.1.2 Measurable Goals**

- Update the HVPS Inventory on an annual basis.

#### **5.1.3 Schedule**

- Annually, 2022-2027.

#### **5.1.4 Annual Report Documentation**

- Updated HVPS Inventory.

## 5.2 HVPS STORMWATER INSPECTION PROGRAM

### 5.2.1 Description

The City of Tybee will inspect 100% of the facilities listed on the City's HVPS Inventory over the course of the five (5) year permit period (2022 – 2027), with a minimum of at least one HVPS inspection conducted each reporting period. If more than five (5) HVPS facilities are listed on the City's inventory, the City will inspect a minimum of 5% of the HVPS facilities each year.

A City inspector will visit the HVPS site and assess the condition and presence of stormwater pollutants onsite. City staff will inspect the site for evidence of stormwater pollution in the following areas and determine if there is any evidence of an illicit discharge:

- 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

The following procedures will be followed during HVPS inspections and as follow-up to the inspections:

- The City inspector will meet with facility staff, if possible, before/during/or after the site visit to discuss the purpose of the inspection, any issues, noted, and steps the facility can take to prevent stormwater pollution. Facility staff may be invited to accompany the City inspector during the site visit, if this is deemed appropriate by the City inspector.
- All HVPS inspections will be documented. HVPS inspections will typically be documented through a field collection application that is downloaded on City-owned smart phones and/or tablets and will be recorded within the City's GIS layer. For City staff that do not have the field collection application available and/or in situations when a field collection application cannot be used for other reasons, a paper copy version of the HVPS inspection checklist may be used to record the inspections. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and a copy of a paper inspection checklist is provided in Appendix D.
- Educational literature, including literature about proper waste management and disposal and other relevant topics, may be supplied at the time of the site inspection or as follow-up to the site inspection if needed.
- Should an inspection reveal a potential threat to water quality in the MS4, City staff will notify the industry or business, and provide them with a copy of the inspection checklist and/or written notification of the issue if deemed necessary. The City may request

follow-up documentation and/or perform a re-inspection to ensure that all necessary corrections were made if deemed necessary. Electronic correspondence may also be used to communicate site findings and issues to facility personnel.

- Enforcement of any identified illicit discharges will be handled in accordance with the City's Illicit Discharge prohibition in the Stormwater Management Ordinance, IDDE, and ERP.
- If the violation is not corrected, the EPD may be notified of the problem. The City will also notify the EPD if assistance is needed for enforcement or if there is a threat to Waters of the State. The City may, during the investigation of a violation of the City's IDDE Ordinance, complete or require monitoring of a suspected HVPS, in order to secure evidence to support the alleged violation.
- The City will maintain records of inspections results, problems found, and actions taken.

### **5.2.2 Measurable Goal**

- Inspect 100% of HVPS facilities in the City's inventory over the 5-year permit period. Inspect at least one HVPS site each reporting period, or, if there are more than five sites listed on the City's inventory, inspect at least 5% of the HVPS facilities in the inventory annually.
- Document site inspections and recommended corrective actions/violations.
- Enforce the Stormwater Management Ordinance, IDDE, and ERP as needed.

### **5.2.3 Schedule**

- Annually, 2022 – 2027.

### **5.2.4 Annual Report Documentation**

- The total number of HVPS facilities and the number and percentage of inspections conducted during the reporting period.
- Documentation of inspections, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed site inspection checklist for each HVPS facility inspected during the reporting period and any available follow-up documentation.

## **5.3 ENFORCEMENT PROCEDURES**

### **5.3.1 Description**

If an illicit discharge is identified during an HVPS site inspection, the City will initiate enforcement procedures as outlined in the City's Enforcement Response Plan (Appendix F) and maintain documentation.

If an illicit discharge has not taken place but practices onsite indicate a high probability that such a discharge could occur, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection and recommend corrective actions to address the potential issue. The City will also make the owner/operator aware of the Georgia Stormwater Management Manual and the Coastal Stormwater Supplement, which address pollution prevention and good housekeeping practices.

### **5.3.2 Measurable Goal**

- Implement enforcement procedures for violations noted during HVPS inspections.
- Document enforcement actions taken in violation/enforcement action log and/or other appropriate written documentation (letter to facility, copy of warning and/or Notice of Violation, etc.).

### **5.3.3 Schedule**

- Ongoing, 2022 – 2027: Take enforcement procedures, as needed and appropriate.

### **5.3.4 Annual Report Documentation**

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

## **5.4 EDUCATIONAL ACTIVITIES**

### **5.4.1 Description**

The City performs multiple educational activities that target HVPS facilities. These include:

- When performing site inspections, City staff have a face-to-face meeting with the manager or staff member during or immediately following an HVPS inspection (if possible) to provide information and tips on pollution prevention control measures at their facility and proper materials/waste storage practices.
- City staff usually distribute educational materials during HVPS inspections, and often include educational materials with site inspection letters or other written information that may be sent to a site after the HVPS inspection is completed. Based on the type of facility and operations, City staff select appropriate handouts and brochures from this collection to distribute to facility personnel
- The City's Stormwater webpage (<https://www.cityoftybee.org/357/Storm-Sewer-Drainage>) features downloadable electronic educational brochures that provide information about proper waste management & disposal of hazardous wastes for residential, commercial and industrial operations such as automobile maintenance, gas stations, and restaurants & food service entities. The Stormwater webpage also includes a link to the Chatham County Resource Conservation Education Center website which provides additional information regarding how to properly dispose of hazardous waste and used oil, as well as other common "hard to recycle" wastes. This website includes a listing of facilities and businesses that will accept waste oil, toxic wastes, and recyclables from the general public, including the City of Tybee residents and businesses. During and /or after site inspections, the City may direct local businesses that are inspected to the City's stormwater webpage to ensure facility personnel are familiar with the educational materials and resources available to them on the City's webpage.
- Educational brochures are often available for pickup at City Hall or handed out at City events that contain relevant information for business owners as well as citizens.

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

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

### **5.4.3 Schedule**

- Ongoing, 2022 – 2027: Maintain educational materials on website.
- Annually, 2022 – 2027: Distribute educational materials during HVPS inspections.

### **5.4.4 Annual Report Documentation**

- 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's Enforcement Response Plan (ERP) describes the actions taken for violations associated with the NPDES Permit and the SWMP. The ERP, a copy of which is located in Appendix F, details the City's responses to any noted stormwater violations, including escalating enforcement responses to address repeat and continuing violations. The plan details 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. Tybee performed a comprehensive update of the ERP in December 2020 that was reviewed and approved by EPD in February 2021.

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**

- Review the ERP annually and update as needed.
- Take enforcement actions, as needed and appropriate.

##### **6.1.3 Schedule**

- Ongoing, 2022 – 2027: Take enforcement actions, as needed and appropriate.
- Annually, 2022 – 2027: Review and update ERP, if necessary.

##### **6.1.4 Annual Report Documentation**

- Copy of ERP if revised 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*

#### **7.1 IMPAIRED WATERS PLAN**

##### **7.1.1 Description**

At this time, the most recent approved Georgia 305(b)/303(d) List of Waters303(d) list of coastal streams shows that there are no waterways currently designed as “impaired” that are located within the jurisdictional boundary of Tybee Island. Therefore, an Impaired Waters Plan (IWP) is not required.

The City will annually review Georgia EPD’s updated 305(b)/303(d) list to identify waters not supporting their designated use within the jurisdiction. If any impaired waters are identified, the City will prepare a revised IWP for the pollutant(s) of concern and submit a copy of the document to EPD for approval. Following approval of the IWP, the Plan will be implemented and a copy will be incorporated into the SWMP.

##### **7.1.2 Measurable Goal**

- Conduct annual review of the most recently-approved 305(b)/303(d) list, and prepare IWP, if required.

##### **7.1.3 Schedule**

- Annually, 2022 – 2027.

##### **7.1.4 Annual Report Documentation**

- Copy of Plan (if required to develop).
- Summary of monitoring data, any water quality trends, and plan implementation activities conducted during the previous reporting period (if a Plan was developed in a previous reporting period).

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## **8 MUNICIPAL EMPLOYEE TRAINING**

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### **8.1 MUNICIPAL EMPLOYEE TRAINING PROGRAM**

#### **8.1.2 Description**

The City of Tybee will conduct annual employee training for employees responsible for implementation of the SWMP. Training may be provided via in-person meetings, powerpoint presentations and/or videos or, alternatively, the City may send employees offsite 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 such topics as good housekeeping, IDDE, industrial and HVPs inspections, E&S inspections, Green Infrastructure/Low Impact Development (GI/LID) and/or pollution prevention procedures. The City will keep records of the training including the training agenda and/or materials, training date(s), as well as a list of attendees.

#### **8.1.3 Measurable Goals**

- Provide annual stormwater training for applicable employees.
- Document stormwater training activities.

#### **8.1.4 Schedule**

- Annually, 2022-2027.

#### **8.1.5 Annual Report Documentation**

- Documentation of training activities, including a summary of training materials or training agenda.
- Copy of sign-in sheets or other documentation showing the name and number of training attendees and the date of training.

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## 9 PUBLIC EDUCATION

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### *Permit Section 3.3.9: Public Education*

#### 9.1 PUBLIC EDUCATION OUTREACH

##### 9.1.1 Description

The City of Tybee has developed a comprehensive, multi-faceted public stormwater education program to educate citizens and business owners about the importance of stormwater pollution prevention. For example, the City uses social media to raise awareness about proper stormwater practices and to discourage littering. The City operates a public Facebook group at <https://www.facebook.com/cityoftybeeisland> and posts messages to it, and also operates social media campaigns on Twitter, Instagram, and YouTube. In addition, Fight Dirty Tybee, a volunteer organization affiliated with the City, also maintains an active internet presence thru its website & social media page to discourage littering and educate the community about beach cleanups, ways to recycle wastes, and keep the public updated on current activities and opportunities for public involvement as well as education.

Other educational activities the City participates in includes distributing brochure and fliers at City Hall and/or during City outreach events; providing stormwater educational materials as inserts with utility bills or include educational messages as a utility bill header; and/or publishing educational information in the local newspaper, City newsletter, or other media outlets.

Educational topics covered during educational events or outreach efforts may include:

- Advertising the link to the City's Stormwater Webpage and SeeClickFix webpage to report illicit discharges and other stormwater concerns;
- Providing information about citizen involvement opportunities with the City's Stormwater Management Program and important events (like trash clean-ups, etc.);
- Nonpoint source pollution and its impact on waterways and wildlife;
- Tips to prevent stormwater pollution & illicit discharges and properly manage wastes, such as information about litter reduction; pet waste management; and disposal of fats, oils & greases;
- Education about how stormwater is discharged directly into waterways without chemical/biological treatment;
- GI/LID practices and techniques;
- Proper storage and application practices for pesticides, fertilizers, and herbicides;
- Good housekeeping and stormwater pollution prevention practices for commercial establishments
- Septic tank system maintenance

The City will conduct at least one dedicated public stormwater educational outreach activity from the list below in Section 9.1.2 each reporting period to educate the public about stormwater topics and maintain documentation of the event. This may include information about the educational topics listed above and/or other relevant stormwater topics selected by the City. The City may opt rotate public education activities to reach intended target audiences and/or provide specific types of stormwater-related education based on areas of concern identified by HVPS/Industrial site inspections, citizen complaints, and/or common illicit discharges.

### **9.1.2 Measurable Goals**

Perform at least one of the following stormwater-related educational outreach activities each reporting period:

- a. Distribute educational brochure and fliers at City Hall and/or during City outreach events;
- b. Post at least three educational messages to social media;
- c. Provide educational materials as inserts with utility bills or include educational messages as a utility bill header; or
- d. Publish educational information in the local newspaper, City newsletter, or comparable media outlet that reaches a wide City audience.

### **9.1.3 Schedule**

- Annually, 2022-2027.

### **9.1.4 Annual Report Documentation**

The following documentation for the selected public outreach event will be provided:

- a. Tracking database showing the name and number of educational brochure(s) distributed at City Hall or during City outreach events and a copy of the brochure/flier;
- b. Copy of educational messages posted to social media and/or screenshot of the postings;
- c. Copy of educational insert or copy of educational message included with utility bill; or
- d. Copy of educational information posted in the newspaper, City newsletter, or comparable media outlet.

## **9.2 KEEP TYBEE TIDY LITTER INITIATIVE**

### **9.2.1 Description**

The City has implemented and continues to maintain an extensive number and variety of educational tools to educate the public, including residents as well as visitors, about the importance of not littering, which the City collectively refers to as “Keep Tybee Tidy Litter Initiatives.” This includes the installation of large aluminum signs at the entrance to beach crossovers; beach crossover decals placed on beach crossover planks; and Banner Flags placed on the beach. The purpose of the signage is to remind citizens and visitors to “Leave Only Your Footprints” and clean beach areas and remove all trash before leaving the beach. The City also routinely prints and distributes colored magnets, referred to as “Beach Rules Magnets” to short-term vacation rentals, hotels, bed and breakfast inns, and the Visitor’s Center to educate visitors of beach rules and proper waste management practices before they arrive at the beach.

The City will continue to conduct at least one dedicated litter initiative activity from the list below in Section 9.2.2 each reporting period.

### **9.2.2 Measurable Goals**

Perform at least one of the following litter initiatives each reporting period:

- a. Install new and/or maintain existing beach signage, including “Leave Only Your Footprints” aluminum signs, decals, and/or Banner Flags;
- b. Post at least one educational message to social media that is dedicated to promoting the City’s litter initiatives and/or ways to help keep Tidy litter-free; or
- c. Distribute “Beach Rules Magnets” to local businesses and the Visitor’s Center.

### **9.2.3 Schedule**

- Annually, 2022-2027.

### **9.2.4 Annual Report Documentation**

The following documentation for the selected litter initiative will be provided:

- a. Documentation showing the cost and/or number of beach signs installed and/or maintenance records for existing beach signage (this may include documentation of “man hours” worked to maintain beach signage, work orders, invoices for maintenance repairs, etc.);
- b. Copy of educational messages posted to social media and/or screenshot; or
- c. Tracking database or invoice showing the number of Beach Rules magnets purchased and distributed.

## **9.3 STORMWATER WEBPAGE**

### **9.3.1 Description**

The City maintains a dedicated stormwater webpage, linked to the City’s official website, for disseminating information to the public. The stormwater webpages may be accessed at <https://www.cityoftybee.org/357/Storm-Sewer-Drainage>.

The City’s stormwater webpages include information on stormwater issues and stormwater pollution prevention as well as links to educational brochures and programs intended to protect water quality. Illicit Discharges and other stormwater concerns can also be reported via a SeeClickFix link or telephone number listed on the webpage, and a copy of the City’s most recent SWMP and Stormwater Annual Report are also posted on the webpage.

The City will review its stormwater webpages each reporting period to ensure all embedded links are working properly and direct the readers to the most up-to-date resources. For example, the City will ensure that the most recent SWMP and Annual Report are posted to the webpage. The City will also monitor “hits” to determine how many people visit the webpages each year. The City may also opt to update the webpage with new stormwater-related information and links on an “as-needed” basis, including educational information about topics listed in Section 9.1.1 of this Plan.

### **9.3.2 Measurable Goals**

- Maintain stormwater webpage linked to the City’s official website.
- Review stormwater webpage each reporting period to ensure embedded links are working properly and direct readers to the most updated resources. Updates (new content) may be made to the stormwater webpage on an as-needed basis.
- Record the number of webpage hits using a tracker, such as Google Analytics or other comparable counting mechanism.

### **9.3.3 Schedule**

- Annually, 2022-2027.

### **9.3.4 Annual Report Documentation**

- Screenshot of webpage or summary of webpage changes.
- Number of webpage views.

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## **10 PUBLIC INVOLVEMENT PROGRAM**

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### *Permit Section 3.3.10: Public Involvement*

#### **10.1 CITIZEN REPORTING HOTLINE & STORMWATER PROGRAM INVOLVEMENT**

##### **10.1.1 Description**

The City of Tybee maintains a link on the City's official website that allows citizens and visitors to report concerns thru SeeClickFix, including illicit discharges and illegal dumping. The link is accessible directly from the City's stormwater webpage as well as from the City's main website. The City's website also provides a telephone phone number (912-786-4573) to contact the City for any purpose, including a request for service and/or report illicit discharges to the stormwater system. The City promotes the stormwater webpage and ability to report concerns and questions thru SeeClickFix as a part of other public education initiatives. For additional information about how the City addresses and tracks issues reported thru the Citizen Reporting Hotline, see Section 2.4 of this Plan.

The City of Tybee Island has also established procedures for encouraging citizens to become more knowledgeable about, and actively involved with, the City's Stormwater Program. A copy of the City's most recent SWMP and Stormwater Annual Report are posted on the City's stormwater webpage along with a description explaining the purpose of these documents. Residents are invited to provide input on the City's SWMP and Annual Report and may submit questions, comments, or suggestions thru an embedded link.

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

- Maintain Citizen Reporting Hotline, including an electronic reporting mechanism and/or telephone number, and post the City's most recent SWMP and Annual Report to the City's stormwater webpage.
- Investigate 100% of all water quality complaints received.
- Take appropriate action for 100% of complaints requiring action.
- Record IDDE complaints and actions taken in the City's Work Order Database (PubWorks).

##### **10.1.3 Schedule**

- Ongoing, 2022 – 2027: Update Work Order Database (PubWorks) as calls are received.
- Ongoing, 2022 – 2027: Take action for complaints received, as appropriate.
- Annually, 2022 – 2027: Ensure stormwater webpage lists proper telephone number and/or contains a working link for electronic reporting of stormwater issues as well as most updated copy of SWMP and Annual Report.

#### **10.1.4 Annual Report Documentation**

- Screenshot of stormwater webpage advertising the Citizen Hotline, SWMP, and Annual Report.
- Documentation of citizen complaints, investigations, actions taken during the reporting period, and status of the complaint.



## **10.2 PUBLIC INVOLVEMENT OUTREACH**

### **10.2.1 Description**

The City of Tybee provides many opportunities to solicit citizen input and encourage the public to help protect stormwater quality and reduce nonpoint source pollution thru City events and participation in community programs. Public involvement outreach activities may include hosting community events open to the public, such as waste collection events and/or “Bring One for the Chipper” and participating in a native plant or tree sale that is open to Town residents. The City also assists Fight Dirty Tybee, a local nonprofit organization affiliated with the City of Tybee, with the coordination of a “Turtle Friendly Restaurant Campaign.” The purpose of this initiative is to encourage local restaurants to reduce or eliminate the use of plastic items such as straws and bags and replace them with “turtle-friendly” products. Restaurants that commit to plastic reduction are recognized as “Turtle Friendly” Restaurants and receive a window decal, certificate, and recognition at City Council meetings and thru social media. Currently, eight local restaurants have received this designation and the City continues its campaign to encourage additional restaurants to participate in this program.

The City will conduct at least one dedicated public stormwater involvement outreach activity from the list below in Section 10.2.2 each reporting period to involve the public with administration of the City’s stormwater program. The City will advertise the event thru the City’s website, social media, or other methods, and maintain documentation that the event was held.

### **10.2.2 Measurable Goal**

Perform at least one of the following public involvement outreach activities each reporting period:

- a. Operate a recycling / waste collection event (for hard-to-recycle items such as printer ink cartridges and/or batteries, etc.) at a City-sponsored event open to the general public or at City Hall;
- b. Participate in a “Bring One for the Chipper” event to encourage City residents to properly dispose of Christmas trees by bringing them to a dedicated location to be chipped and recycled into mulch;
- c. Participate in a Native Plant Sale to encourage City residents to plant native vegetation and reduce water use;
- d. Participate in a Tree Sale to encourage Town residents to plant more trees; or
- e. Assist Fight Dirty Tybee with “Turtle Friendly” Restaurant Campaign and continue ongoing efforts to promote plastic elimination or reduction by local restaurants.

### **10.2.3 Schedule**

- Annually, 2022-2027.

#### **10.2.4 Annual Report Documentation**

The following documentation for the selected public involvement outreach event will be provided:

- a. Documentation of the event advertisement to Tybee residents (such as a screenshot and/or copy of the press release or event flier) and proof that the event was held (such as photographs, the quantity of wastes/recyclables collected at the event, landfill receipt, etc.) ;
- b. Documentation of the event advertisement to Tybee residents (such as a screenshot and/or copy of the press release or event flier) and proof that the event was held (such as photographs and/or copy of the statewide drop-off location database from Keep Georgia Beautiful Foundation);
- c. Documentation of the Native Plant Sale event advertisement to Tybee residents (such as a screenshot and/or copy of the press release or event flier) and proof that the event was held (such as photographs, sign-in sheet, etc.);
- d. Documentation of the Tree Sale event advertisement to Tybee residents (such as a screenshot and/or copy of the press release or event flier) and proof that the event was held (such as photographs, sign-in sheet, etc.); or
- e. Database listing of restaurant participants who have received the “Turtle-Friendly” designation and a description of tasks performed to administer the campaign and/or a copy of decals and/or certificates that are provided to participating restaurants.

## **10.3 CLEAN-UP EVENT**

### **10.3.1 Description**

The City of Tybee will host a clean-up event, or coordinate with Fight Dirty each year to host a clean-up event, within the City to remove trash and debris from local roads and/or the beach and waterways and invite the general public. The City may coordinate this event in conjunction with other events such as the Tybee Beach Sweep, Great American Cleanup, Adopt-A-Stream's Rivers Alive event, or other events. The City will advertise the event thru the City's website, social media, or other methods, and maintain documentation that the event was held.

### **10.3.2 Measurable Goals**

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

### **10.3.3 Schedule**

- Annually, 2022 – 2027.

### **10.3.4 Annual Report Documentation**

- Documentation of the event advertisement to Tybee residents (such as a screenshot and/or copy of the press release or event flier).
- One form of documentation as “proof” that the event was held (such as photographs, the quantity of wastes/recyclables collected at the event, sign-up sheet, landfill receipt for wastes collected and disposed of, etc.).

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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. A copy of the City's Stormwater Management Ordinance is provided in Appendix B.

The City's Stormwater Management Ordinance requires the use of post-construction stormwater management and site planning and design criteria to protect stormwater from negative impacts associated with land development, including the stormwater design criteria established in the CSS and GSMM. The design criteria and performance standards listed in the City's Ordinance are consistent with the latest version of the GSMM and CSS, and the requirements of Section 3.3.11(a)(2) of the City's MS4 permit. The criteria apply to new development and redevelopment that creates or adds more than 5,000 square feet of impervious surface or that involves land disturbing activities of 1 acre or more, including projects less than 1 acre if they are part of a larger common plan of development or sale.

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.

The City will continue to review its Stormwater Management Ordinance annually and revise it as needed to ensure appropriate post-construction stormwater controls are in place.

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

- Enforce the use of the Post Construction Runoff Control requirements in the City's Stormwater Management Ordinance for applicable development and redevelopment.
- Annually evaluate the Stormwater Management Ordinance for post-construction runoff control requirements to determine if revisions are required.
- Update the Ordinance, if required.
- If and when needed, develop linear project feasibility program to apply to future linear projects.

### **11.1.3 Schedule**

- Ongoing, 2022 – 2027: Enforce the [Stormwater Management Ordinance](#).
- Annually, 2022 – 2027: Review and update Ordinance if necessary.

### **11.1.4 Annual Report Documentation**

- Updated Stormwater Management Ordinance, if revised during the reporting period.
- 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)*

### **11.2.1. Legal Authority**

#### **11.2.1.A. Description**

For the 2022-2027 permit period, the City will annually review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration, and document the assessment. The City will assess those regulations governing residential and commercial development, road design, land use, and parking requirements. During the regulatory review, the City will also consider the inclusion of incentives for use of GI/LID practices into the ordinance. The City will perform a comprehensive review of building codes, ordinance, and other applicable regulations at least once during the 2022-2027 permit period using the Code and Ordinance Worksheet developed by the CWP, the Water Quality Scorecard developed by the Environmental Protection Agency (EPA) or another comprehensive code evaluation tool.

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

- Annually review City ordinances, building codes, and other regulations to determine if they impede GI/LID approaches. At least once during 2022-2027, perform comprehensive review using the CWP's Code and Ordinance Worksheet, EPA Scorecard, or another comprehensive code evaluation tool.
- Document the review.

#### **11.2.1.C. Schedule**

- Annually, 2022 – 2027.

#### **11.2.1.D. Annual Report Documentation**

- Copies of any updated code(s), if revisions were made.
- Documentation of the regulatory review.

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

### **11.2.2.A. Description**

The City has developed and implemented a GI/LID Plan that addresses procedures for evaluating the feasibility and site applicability of different GI/LID techniques, allowable GI/LID structures, and procedures for the inspection and maintenance of the GI/LID structures.

Revisions to the City's GI/LID Plan were submitted to EPD during the former 2017-2022 permit period and approved by the EPD in February 2021. A copy of the City's most recently revised GI/LID Plan is included in Appendix H. The City will annually review the GI/LID Program and make changes as needed.

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

- Implement the approved GI/LID Plan.
- Review the GI/LID Plan annually and make updates as needed.

### **11.2.2.C. Schedule**

- Ongoing, 2022-2027: Implement GI/LID Plan.
- Annually, 2022-2027: Review GI/LID Plan, and update as needed.

### **11.2.2.D. Annual Report Documentation**

- Copy of updated GI/LID Plan, if revised.

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

#### **11.2.3.A. Description**

The City has developed an inventory of water quality-related GI/LID structures. A copy of the City's GI/LID Inventory is provided in the GI/LID Plan in Appendix H. Tybee considers the following structures to be GI/LID structures:

- Bioretention Areas / Rain Gardens
- Dry Enhanced Swale (Bioswale)
- Green Roofs
- Rainwater Harvesting
- Vegetated Filter Strip
- Permeable pavement (pervious concrete, porous asphalt, concrete grid pavers, permeable interlocking pavers, plastic grid pavers, etc.)

Ownership categories listed on the inventory include:

- 1) City-owned structures and/or structures that are the operational responsibility of the City;
- 2) Structures that are owned by a public entity other than the City (such as the Board of Education and other entities not covered by an NPDES permit); and
- 3) Privately-owned, non-residential GI/LID structures.

New GI/LID structures added during new development/redevelopment will be identified through the site plan development process, and the City will update the GI/LID inventory during each reporting period if new structures were added. The City will also ensure that maintenance agreements are executed for all new non-permittee owned structures constructed after the effective date of the City's current permit (April 12, 2022).

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

- Identify new GI/LID structures during site plan review.
- Update inventory with new GI/LID structures, if needed.
- Ensure maintenance agreements are executed for all new non-permittee owned GI/LID structures constructed after April 12, 2022.

#### **11.2.3.C. Schedule**

- Annually, 2022 – 2027.

#### **11.2.3.D. Annual Report Documentation**

- Copy of most updated GI/LID Inventory, including the type, ownership, and total number of structures.



## **11.2.4. Inspection and Maintenance Program**

### **11.2.4.A. Description**

#### Inspections

City staff or their designated representatives will inspect 100% of inventoried GI/LID structures within the 5-year permit period and at least one inspection will be conducted each reporting period. If more than five (5) GI/LID structures are listed on the inventory, the City will inspect at least 5% of the structures annually.

Inspections will be documented using the inspection sheets included within the City's GI/LID Plan (Appendix H) or through a field collection application that is downloaded on City-owned smart phones and/or tablets and recorded within the City's GIS layer. The field collection application and paper inspection checklist contain the same questions. A table listing the information that will be collected and documented during site inspections within a GIS database and copies of paper inspection checklists (contained within the GI/LID Plan) are provided in Appendix D and H, respectively.

#### Maintenance

In order to ensure that private, non-residential GI/LID structures and publicly-owned structures owned by other entities are maintained by their owner in accordance with the CSS, the City requires developers of GI/LID structures not owned by the City to complete an Inspection & Maintenance Agreement with the City, prior to the issuance of an LDA permit. The Inspection & Maintenance agreement and stormwater management design plan is approved by the City and recorded with the deed upon approval during the site plan review process. The Inspection & Maintenance Agreement, a model of which is included as an attachment to the GI/LID Plan in Appendix H, 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 City will retain copies of maintenance agreements finalized after the effective date of the current permit (April 12, 2022) and develop a summary list of the new agreements. This list will also include any maintenance agreements that were obtained for GI/LID structures constructed in previous permit periods. The summary list will be reviewed and updated each reporting period.

During routine inspections, if the City staff determine that the owner is not properly maintaining their 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 inventoried structures every 5 years, with at least one structure inspected annually. If there are more than five (5) structures on the inventory, 5% of the structures will be inspected annually.
- Document inspections on the City’s approved inspection checklists.
- Conduct maintenance of City-owned structures as needed.
- Ensure maintenance of structures not owned by the City is conducted in accordance with the Inspection & Maintenance Agreement.
- Enforce provisions of the Inspection & Maintenance Agreement and the Stormwater Management Ordinance.
- Retain copies of new maintenance agreements and maintain/update a summary list of maintenance agreements.

**11.2.4.C. Schedule**

- Annually, 2022-2027.

**11.2.4.D. Annual Report Documentation**

- Number and percentage of GI/LID structures inspected and maintained during the reporting period.
- Documentation of inspections conducted, such as a table of individual inspection reports with a record for each site inspected and the findings of that inspection, or a copy of the completed inspection checklist for each structure inspected during the reporting period.
- Summary and/or documentation of any maintenance and/or enforcement activities conducted to address issues identified during the GI/LID inspections.
- Updated summary list of Inspection & Maintenance Agreements.