

STORMWATER MANAGEMENT PLAN

In accordance with the
Arizona Pollutant Discharge Elimination System
Small Municipal Separate Storm Sewer Systems Permit 2016
Permit No. AZG2016-002
Issued on: September 30, 2016

Prepared for:



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March 2017

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EXECUTIVE SUMMARY

The Town of Gilbert must develop and implement a Stormwater Management Plan (also referred to as a Stormwater Management Program [SWMP]) as required by the Arizona Department of Environmental Quality's (ADEQ) Arizona Pollutant Discharge Elimination System (AZPDES) General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) to Waters of the United States No. AZG2016-002 (Permit). The Permit was issued by ADEQ effective on September 30, 2016 and supersedes Permit No. AZG2002-002 issued by ADEQ on December 19, 2002.

This SWMP has been developed in accordance with 40 CFR Part 122; Arizona Revised Statutes (ARS) Title 49, Chapter 2, Article 3.1; and Arizona Administrative Code (AAC) Title 18, Chapter 9, Articles 9 and 10. The SWMP has been prepared to meet the requirements identified in Permit section 5.1

This SWMP outlines the Town's program to reduce the discharge of pollutants to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate requirements of the Clean Water Act (CWA) in accordance with ADEQ's Stormwater Phase II program. This goal is achieved through implementing six minimum control measures (MCMs):

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination (IDDE) Program
- Construction Activity Stormwater Runoff Control
- Post-Construction Stormwater Management in New Development and Redevelopment
- Pollution Prevention and Good Housekeeping for Municipal Operations

The SWMP is designed to be a comprehensive program document outlining how the stormwater program is implemented and maintained, therefore, additional sections have been added to address:

- Legal Authority
- MS4 Mapping
- Monitoring
- Program evaluation and revision
- Reporting

1.0 INTRODUCTION

Gilbert is located in Maricopa County (see Figure 1), has a population of approximately 208,403 (based on 2010 U.S. Census Bureau data), and has an incorporated area of approximately 68 square miles. Gilbert is located within the Phoenix urbanized area and is required to comply with the Phase II regulations as outlined by ADEQ. The SWMP covers all areas within the Town's incorporated area.

2.0 STORMWATER SYSTEM

The Town's stormwater system is comprised of a system of municipally owned or operated stormwater conveyances consisting of curbs, gutters, inlets, catch basins, underground pipes, retention basins, natural washes and man-made channels. The stormwater system is maintained by the Town's Public Works Department.

3.0 RECEIVING WATERS

Stormwater in the southwestern portion of the Town discharges to the East Maricopa Floodway (EMF), which eventually terminates at the Gila River, which is a water of the United States. The EMF was constructed by the U.S. Soil Conservation Service along the east side of the Roosevelt Water Conservation District (RWCD) Canal to serve as a regional stormwater outfall for eastern Maricopa County. The EMF is now owned and operated by the Flood Control District of Maricopa County (FCDMC) and serves as the primary outfall and flood conveyance from three watersheds: Buckhorn-Mesa, Apache Junction Gilbert, and Williams-Chandler. The EMF starts at Brown and Greenfield Roads (Mesa), parallels the RWCD Canal, and extends more than 27 miles across the Maricopa County southern boundary into Pinal County, across the Gila River Indian Community to its outfall at the Gila River. The EMF discharges more than 15,000 cubic feet per second in a 100-year storm event. The floodway is mostly constructed as a compacted earthen trapezoidal channel, ranging from 150 to 300 feet in width and 8 to 12 feet in depth. A stretch of approximately 1 mile in length located along Williams Gateway Airport is concrete-lined, as is another approximately 0.5-mile section of the floodway in Pinal County. Subsequently, the Town does not discharge into any waters with approved Total Maximum Daily Loads (TMDLs).

4.0 LEGAL AUTHORITY

Chapter 30, Article III of the Town Code presents the legal authority for the control of pollutants that are or may be discharged to the public storm drain system. The Director of Public Works, or their designee, has the authority to, among other things: prohibit discharges, perform inspections, require stormwater controls, perform monitoring, and take action against any violators. Offenders found in violation of the ordinance may be penalized in accordance with Chapter 30, Article III, Section 30-60 of the Town.

4.1 ENFORCEMENT

The following individuals have been designated by the Town Manager to support and enforce stormwater provisions of the Town Code and SWMP:

- The Director of Public Works is delegated the authority to exercise the powers and perform the duties set forth in the Town's Code of Ordinances and to administer and enforce provisions of said ordinance.
- The Director of Public Works may designate other employees to exercise such powers and perform such duties, as he/ she deems appropriate.

To comply with the Permit, the Town has created an Enforcement Response Plan (ERP). The ERP outlines a set of escalating enforcement measures the Town will follow to enforce its relevant stormwater ordinances. Escalation measures presented in the ERP are briefly described below, and the ERP is presented in Attachment J:

- A verbal warning
- A written warning
- Notice of Violation
- Civil Citations
- Criminal Penalties

If the violator fails to take actions or fails to act in a timely manner, the Town may proceed with its abatement process as described in the Town Code. The Town will perform the minimum corrective actions to restore compliance with the SWMP, and the violator will be responsible for the associated costs to reimburse the Town.

5.0 MS4 MAPPING

The Town's Engineering Department has developed a Geographic Information System (GIS) database to manage its storm sewer system information. All of the known washes and storm drainage related facilities are currently included in the GIS database. The Town maintains an up-to-date map of Town-owned washes, catch basins, outfalls and retention basins. Additional stormwater related information such as citizen complaints, dry weather screening results, and monitoring/sampling data may also be entered into the system.

The database is kept current as new developments are completed or as Town boundaries are modified. The Town will describe any updates performed in its annual report as outlined in section 8.4 of the Permit.

6.0 MINIMUM CONTROL MEASURES

The SWMP outlines the six minimum control measures (MCMs) that are required by the Permit. The six minimum controls are:

1. Public Education and Outreach
2. Public Participation and Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control

5. Post-Construction Runoff Control
6. Pollution Prevention/Good Housekeeping

The MCMs are described in detail in the following sections. Each MCM contains Best Management Practices (BMPs) selected by the Town. Each BMP is a specific activity the Town will take to achieve compliance with the MCM. Tables for each control measure, including a list of BMPs, a description of each BMP, measurable goals, responsible party and frequency or deadline can be found at the end of the report (see section 14.0 Tables). A table containing the title and responsibility for implementing the SWMP is provided in Attachment C.

In addition to these MCMs, the permit also requires the development of an ERP, a written SWMP (this document), an annual report, and if required, analytical monitoring for certain waterbody conditions. Note that the Town does not discharge to impaired or OAW water bodies; therefore, no analytical monitoring is required.

6.1 MCM-1: PUBLIC EDUCATION AND OUTREACH

This section is intended to meet the requirements outlined in Permit section 6.4.1. The Public Education and Outreach MCM targets different sectors of the public. According to the US Census Bureau, the general public demographics for Gilbert include:

- The average household size is 3.13 persons per household.
- 41.3% of residents over the age of 25 have a Bachelor's degree or higher.
- The median household income is \$82,424.
- 82% of the population is White, while Hispanic or Latino make up 15% of the population.

The Town incorporates the demographics noted above to ensure maximum value and impact.

Table 1 in Section 14.0 identifies the BMPs, schedule, measurable goals, audience and responsible party(s) for the Public Education and Outreach MCM. A summary of these BMPs is provided below.

BMP 1.1 – Local Outreach Group

The Town has partnered with the Phoenix area STORM program, a public education based group of communities that are committed to developing stormwater related radio ads, TV ads, billboards, handouts, brochures, etc. The Town's partnership with STORM supplements the Town's efforts to provide a more comprehensive outreach program.

BMP 1.2 – Printed Materials

The Town will determine the public education focus for each permit year and will then develop and distribute brochures to the services/land uses identified. Examples of these services/land uses include lawn care, pet waste, restaurants, small businesses, agricultural farmers, developers, construction, recreational water usage, and the general public pollution prevention. The Town will update these brochures as needed, and distribute them at local outreach events

such as the Gilbert Water Festival. The Town will collaborate with different organizations such as STORM, Gilbert Water Conservation Outreach Program, and Association of Developers to tailor the brochures to the specific organizations and demographics targeted. The brochures will also be available at the Town Hall and on the Town's website for efficient access.

BMP 1.3 – Town Website

The Town's website contains a page dedicated to stormwater management. The website lists the Town's responsibilities, contains a link to the current SWMP and NOI, and provides information to the public about stormwater. Additionally, a link to the STORM website is provided as another vehicle for getting stormwater related information to the public. Educational material developed in BMP 1.2 above will be included here as well. The website also contains a complaint and investigations page where residents can update information concerning stormwater.

6.2 MCM-2: PUBLIC PARTICIPATION AND INVOLVEMENT

This section is intended to meet the requirements outlined in Permit section 6.4.2. The public involvement component of the Town's SWMP is crucial for developing support by the citizenry and is ultimately tied to the success of the SWMP. Stormwater meetings and events will be publicized and open to the public.

Table 2 identifies the BMPs, schedule, measurable goals and responsible party(s) for the Public Participation and Involvement minimum control measure. A summary of these BMPs is provided below.

BMP 2.1 – Local Outreach

The Town of Gilbert will contact a minimum of 10% of local Home Owners Associations (HOAs) each year. They will provide information on stormwater BMP's that the public can implement to improve stormwater quality. The Town will also contact a minimum of 5% of hospitals, restaurants, industrial businesses, commercial businesses, developers, homebuilders, companies, and small businesses annually and establish a point of contact with all of the listed services.

BMP 2.2 – Volunteer Opportunities

Each year the Town coordinates with the community to identify and/or perform projects that help reduce stormwater pollution and raise pollution prevention awareness. Opportunities may involve participants from local area schools, members of the public, local troops of the Boy Scouts of America and Girl Scouts of the USA, etc. Projects may include event participation, storm drain labelling, project identification/assessment, etc. The Town will provide at least one volunteer opportunity each year.

BMP 2.3 – Implement Public Notice

To meet public notice requirements in the Permit, the Town will submit a complete NOI to ADEQ by March 29, 2017. ADEQ will review, approve and distribute the NOI for public review and

comment for a 30-day public comment period. Over this time the public will have the opportunity to provide input on the NOI. The Town will also make available through the Town website a copy of its SWMP, NOI, and the annual stormwater reports.

BMP 2.4 – Procedure for Receiving and Reviewing Public Comment

The Town’s stormwater website contains a complaint and investigations page where residents can provide information concerning stormwater. Citizens have the opportunity to provide input on the Town’s stormwater program through the complaint system and also through the rest of the stormwater website.

6.3 MCM-3: ILLICIT DISCHARGE DETECTION AND ELIMINATION

This section is intended to meet the requirements outlined in Permit section 6.4.3. The program will work to detect and eliminate illicit discharges.

Non-stormwater discharges allowed under General Permit No. AZG2016-002, section 1.3.2 that are not considered “illicit” include:

- water line flushing
- landscape irrigation
- diverted stream flows
- rising ground waters
- uncontaminated groundwater infiltration
- uncontaminated pumped ground water
- discharges from potable water sources
- foundation drains
- air conditioning condensate
- irrigation water
- springs
- water from crawl space pumps
- footing drains
- lawn watering
- individual residential car washing
- discharges from riparian habitats and wetlands
- dechlorinated swimming pool discharges
- street wash water
- and discharge or flows from emergency firefighting activities

The Town has reviewed the above discharges and determined that they are not significant contributors of pollutants to waters of the United States. The Town also reviewed occasional incidental non-stormwater discharges such as charity car washes, etc. and determined they were not typically a significant contributor of pollutants. All discharges to and from the MS4, other than those named above and stormwater discharges, will be treated as potential illicit discharges until identified otherwise, as provided in Chapter 30, Article III, Section 30-54 of the Gilbert Town Code.

Table 3 identifies the BMPs, schedule, and measurable goals for the Illicit Discharge Detection and Elimination Program MCM. The responsible party for implementing the IDDE Program is shown for each BMP in Table 3 in bold. A summary of these BMPs is provided below.

BMP 3.1 – Identifying and Eliminating Illicit Discharges

In conjuncture with education and training, the Town implements an identification and reporting process for identifying and responding to potential illicit discharges to and from the MS4.

Potential illicit discharges are identified primarily through dry and wet weather screening and reports from employees and/or complaints from the public. Additionally, illicit discharges and illicit connections maybe identified through regular Town maintenance activities, such as:

- The outfall/manhole inspection program conducted by the Environmental Compliance staff of the Public Works Department. The storm drainage system outfall/manhole inspection program compliments the existing programs and serves to create a sound, well-rounded program for meeting the goal of the IDDE program.
- A video/camera inspection of the sanitary sewer system conducted by the Wastewater Collection branch of the Wastewater Section. Underground components that are not readily observable, such as parking lot drainage inlets, will be included in the expanded video inspection program. The purpose of the video inspection is to identify illicit discharges and/or illicit connections (ID/IC) that may not otherwise be identified.

Regardless of the reporting route, Illicit Discharges are investigated according to the IDDE SOP in order to meet Permit section 6.4.3.5 (see Attachment K).

BMP 3.2 – Stormwater Sewer Mapping

The Town has completed a GIS database complete with pertinent stormwater system information. The database aids the Town in tracking potential sources of illicit discharges that are reported. The database will aid the Town's efforts in reducing or investigating illicit discharges by providing a visual representation of the areas of concern and displaying the MS4 'network' to trace potential illicit discharge to the potential source. The database will be kept up to date as new developments are completed and as system components are replaced/upgraded.

BMP 3.3 – Dry Weather Screening

Town representatives perform routine dry weather screening, using the IDDE Inspection/Investigation Form (see Attachment D). Potential illicit discharges are reported to Environmental Compliance Inspector for follow up. If an illicit discharge is observed, additional upstream investigations will be performed to determine sources of the illicit discharge and appropriate action will be taken to eliminate the illicit discharge to the stormwater system as described in Chapter 30, Article III, Section 30-60 of the Gilbert Town Code. The illicit discharge will be investigated within two business days of discovery. See Attachment E for the Illicit Discharge/Connection Investigation flowchart.

BMP 3.4 – Wet Weather Monitoring

Town staff will perform a visual inspection of five outfalls, two times during each wet season. Due to safety concerns, the Town will perform inspections during regular business hours only.

For the purposes of wet weather monitoring, the summer and winter wet seasons are defined as:

Summer wet season is June 1st through October 31st
Winter wet season is November 1st through May 31st.

Inspections will be documented on the inspection form IDDE Inspection/Investigation Form (see Attachment D) and Discharge Monitoring Reports (DMRs) will be provided in the annual report.

BMP 3.5 – Unpermitted Facilities and Activities

The Town will work to identify unpermitted facilities and activities that are discharging to the MS4.

- Up to 12 construction sites (greater than 1 acre) located within the Town's limits will be audited for coverage under the AZPDES Construction General Permit (CGP).
- Reports will be run annually by the Business Licensing Department to determine if any new industrial facilities have applied for business licenses within the Town. The businesses SIC codes will be cross-referenced to the Multi-Sector General Permit (MSGP) SIC code list. The Town will cross-reference the list of businesses using ADEQs megasearch database (<http://megasearch.azdeq.gov/megasearch/>) if the business is not listed, the Town will mail an informational letter recommending the business owner contact ADEQ to determine if MSGP coverage is required. Where facilities may need coverage under the AZPDES MSGP, the Town will notify the operator and ADEQ.

The Town will include a list of sites and facilities contacted throughout the year that may require AZPDES permit coverage in the annual report.

BMP 3.6 – Staff Training

See section 7.0 for the training requirements for this MCM. All training schedules, responsibilities, and content are covered in section 7.0.

6.4 MCM-4: CONSTRUCTION

This section is intended to meet the requirements outlined in Permit section 6.4.4. Gilbert recognizes that construction site runoff can transport a significant amount of silt and sediment, as well as other stormwater pollutants, in a short period of time. Implementation for regulating construction projects is fulfilled by Chapter 30, Article I, Section 30-60 of the Gilbert Town Code addressing the sediment erosion and dust control of construction sites (see Attachment I).

Table 4 identifies the BMPs, schedule, measurable goals and responsible party(s) for the Construction Site Runoff Control MCM. A summary of these BMPs is provided below.

BMP 4.1 – Construction Site Inventory

The Town maintains an inventory of all construction sites within Town boundaries that disturb 1 acre or more. Construction projects are managed by the Town's tracking software, EnerGov/Lucity. Construction sites are regularly entered into EnerGov/Lucity when project information is submitted for plan review (see BMP 4.2). The inventory is managed appropriately and is searchable by site address.

BMP 4.2 – Written Procedure for Plans Review

The Town follows a written plans review process for receiving and reviewing Plans. Written procedures to ensure stormwater compliance for construction sites are as follows:

- Construction Plans are submitted to the Town's Development Services Department and the project is logged into the EnerGov/Lucity System.
- As plans are reviewed, approval dates are documented in the EnerGov/Lucity System.
- The contractor is notified once plans have been approved.
- The contractor will then pay the appropriate fees and be issued a building permit from the Town.
- The approved plans are stamped with a reminder for the Contractor to review the associated stormwater requirements with ADEQ.
- The contractor is responsible for providing the Town with an Erosion Control Plan (ECP) and a copy of the NOI, and Authorization To Discharge (ATD) before the contractor can begin earthwork.

Plan review procedures are assessed annually to confirm plans are being routed properly and proper and complete records are being maintained.

See Attachment E for the Construction Project Approval flowchart.

BMP 4.3 – Inspection and Enforcement Procedures

The Town will inspect construction sites for stormwater compliance a minimum of one time during the active phase of construction to check for compliance with Town requirements. If violations are found, the Inspector will notify the Contractor and follow up within 24 hours or 7 days (depending on the severity) to ensure corrective actions have been made. If corrective actions have not been implemented the inspector will begin the enforcement process described in Attachment C. Inspections are documented using the inspection form contained in Attachment D.

In the case that a complaint is received for a potential stormwater non-compliance at or emanating from a construction site, the inspector will initiate an investigation within 7 days of receiving the complaint.

BMP 4.4 – Contractor and Operator Education

STORM has produced a brochure specifically for construction sites. The brochure is available on the Town's website. The public is encouraged to submit comments or concerns to the

Environmental Compliance Division. Additionally, the Town provides contractors with a brochure at the time the building permit is issued.

BMP 4.5 – Staff Training

See section 7.0 for the training requirements for this MCM. All training schedules, responsibilities, and content are covered in section 7.0.

6.5 MCM-5: POST-CONSTRUCTION

This section is intended to meet the requirements outlined in Permit section 6.4.5. Gilbert recognizes that post-construction runoff control is important in reducing the amount of pollutants that may be discharged to local washes and stormwater conveyances. Implementation for regulating post-construction structures is fulfilled by Chapter 30, Article III, Section 30-57 of the Gilbert Town Code addressing the long term operation and maintenance of post-construction stormwater runoff controls (see Attachment I).

Table 5 identifies the BMPs, schedule, measurable goals and responsible party(s) for the Post-Construction Runoff Control MCM. A summary of these BMPs is provided below.

BMP 5.1 – Stormwater Control Inventory

The Town documents new development and redevelopment sites from planning, construction through post-construction. Once construction has been completed, the Contractor submits as-built plans. Once the as-built plans have been finalized, the Town captures post-construction structural stormwater control measures that discharge into the MS4 in the Town's geodatabase. The Town will keep the inventory of stormwater controls current.

BMP 5.2 – Inspection and Enforcement Procedures

See Attachment J of the SWMP for the Enforcement Response Plan.

The Town inspects all publicly owned post-construction BMPs that discharge to the MS4 for proper operation. Upon inspection completion, the Inspector fills out an inspection form (see Attachment D – Post-Construction Site Inspection Form). The inspection forms will be kept on file for a minimum of 3 years after the completion of the project. The Town inspects 20% of post-construction stormwater controls each year.

For privately owned and maintained permanent post construction BMPs, the maintenance of stormwater controls is required by maintenance agreements and, in some cases, managed covenants, conditions, and restrictions. This information will be recorded on the final as-built plans, recorded with the deeds/plats, and entered into the Town's Lucity system. The Town requires the owner/operator to properly maintain all post-construction stormwater controls.

For developments within County islands, the Town will work with Maricopa County to identify parties responsible for BMP operation and maintenance.

BMP 5.3 – Site Plan Review Procedures

The Town requires all plans to be submitted before construction can begin. The Development Services Department reviews the Site Plans for stormwater compliance. Construction may not begin until plans have been approved. After construction has been completed as-built plans must be provided to the Town prior to receiving the Certificate of Occupancy. These design policies will be reviewed and revised annually, if necessary. See BMP 4.2 for additional plan review procedures.

BMP 5.4 – Staff Training

The Town will train applicable employees sufficiently to comply with MCM-5. Training is contained within section 7.0 of this SWMP.

6.6 MCM-6: POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

This section is intended to meet the requirements outlined in Permit section 6.4.6. The pollution prevention/good housekeeping control measure is conducted by municipal staff. The program has been developed to ensure that pollution from municipal sources and activities is minimized and that Town employees are properly trained in the operation and maintenance of Town-owned or operated facilities and activities.

Table 6 identifies the BMPs, schedule, measurable goals and responsible party(s) for the Pollution Prevention/Good Housekeeping minimum control measure. A summary of these BMPs is provided below.

BMP 6.1 – O&M Procedures

Continue the Street Sweeping Program - The Town has an active street sweeping program in place to reduce floatables and other pollutants. Streets are swept in accordance with a master schedule, sweeper maintenance is scheduled and occurs on a regular basis, and maintenance practices incorporate proper control measures including the use of wash racks and proper disposal of collected debris. The street sweeping schedule will be reviewed annually to ensure new areas of development are incorporated into the street sweeping program, as needed.

Street sweepings are brought to the Public Works Field Operations facility prior to disposal. The sweepings piles are tested as mandated by the landfills for hazardous characteristics. If unusual sweepings materials are identified, they will be brought to the attention of the Public Works Director or their designee for evaluation and proper disposal.

Continue the Stormwater Infrastructure Maintenance and Cleaning Program - A water truck and/or vacuum truck are used for cleaning the storm drain inlets and catch basins. The collected debris and sediment are brought back to the Public Works Yard prior to disposal. The piles are tested annually for hazardous characteristics. If unusual debris/sediment are identified, they will be brought to the attention of the Environmental Compliance staff for evaluation and proper disposal.

Dry wells serve as a mechanism for disposal of stormwater in public parks, municipal facilities, and in street rights-of-way. Under the Town's dry well inspection and maintenance program,

Town Sections with responsibility over that area are responsible for conducting periodic inspections of dry wells and scheduling maintenance as needed. Some of the dry wells are located within retention basins. The condition of the retention basin is usually assessed as part of dry well inspection, since it may be source of sediment to the dry well. Retention basin maintenance will be scheduled on an as-needed basis.

Continue implementing pollution prevention practices in the Municipal Maintenance Program - Activities to repair and replace pavement surfaces can lead to urban runoff pollution. Pollutants of concern include broken asphalt and concrete debris, saw-cutting slurry, concrete truck wash-out, sediment, fuel, oil, and other fluids from construction equipment. Urban runoff also can result from other cleaning activities such as graffiti removal and building cleaning. In an effort to reduce urban runoff, the Town implements certain BMPs including conducting repair and maintenance during dry weather, protecting nearby storm drains and water bodies, sweeping debris, and recycling materials where and when appropriate.

BMP 6.2 – Municipal Operations Inventory

The Public Works Department maintains an inventory of Town buildings and properties. Facilities are ranked by priority considering the following aspects: the facility location, if the facility or surrounding areas has a history of dry weather flows, whether materials are stored in a manner to potentially release pollutants into the storm drain system, and whether the facility is covered under another AZPDES regulatory program.

BMP 6.3 – Facility Inspections

The facility inspection schedule is documented in the municipal operations inventory (BMP 6.2) and includes facility priority. More frequent inspections are performed on higher risk facilities. Low priority facilities are inspected once every 5 years. Medium priority facilities are inspected annually and high priority facilities are inspected quarterly. See Attachment L for a full list of the Municipal Inventory.

Facilities with SIC codes that require MSGP coverage are included in the inventory, but are not included for MS4 inspections requirements since they are already regulated under another AZPDES permit.

BMP 6.4 – Implement Pollution Controls

During the course of performing facility inspections, the inspector identifies whether additional stormwater controls or preventative measures may be needed. If areas to preserve or protect stormwater quality are identified, the Inspector will notify the facility supervisor to develop a schedule for improvement. Inspection observations are documented on the Facility Inspection Form included in Attachment D.

BMP 6.5 – Staff Training

See section 7.0 for the training requirements for MCM-6. All training schedules, responsibilities, and content are covered in section 7.0.

7.0 TRAINING

The Town has developed a training program to address the training requirements outlined in the Permit for applicable municipal employees. Training is managed using the software, SilkRoad, which automatically tracks the training programs delivered and training attendees. See table below for an outline of the training classes provided by the Town.

7.1 TYPES OF TRAINING

The following sections describe the typical topics covered in stormwater pollution prevention training conducted by the Town.

Class Title	Description
<p style="text-align: center;">General Illicit Discharge Detection and Elimination</p> <p style="text-align: center;">(Permit section 6.4.3.10)</p>	<p>The goals of the training are to raise awareness, and prevent Illicit Discharges (IDs) and Illicit Connections (ICs), and to encourage employees to report IDs and ICs they may encounter.</p> <p>This training program shows employees who travel around the permitted jurisdiction how to spot a possible illicit discharge or signs of past discharges. It discusses direct and indirect discharges and shows employees what to look for at the curb inlets, drop inlets, and outfalls. It provides examples of the tell-tale signs often left by past illicit discharges. It also encourages employees to be vigilant in watching for signs of illicit discharges and report their suspicions to the environmental compliance staff. It is at the time, the environmental compliance staff will initiate the process of tracking the source of the discharge and eliminating it.</p> <p><u>Target Audience</u> includes appropriate personnel from: Public Works- Wastewater Collections, Wastewater Reclaim, Wastewater Pre-Treatment, Wastewater Reuse, Solid Waste, Environmental Services, Water, Water Meters, Streets, and Wastewater Lift Stations.</p>

Class Title	Description
<p>Ground Control – Construction and Post-Construction (Permit section 6.4.4 and 6.4.5)</p>	<p>The goal of the program is to prevent or reduce pollutant runoff from construction sites, new development and redevelopment projects. It focuses primarily on the types of BMPs that are most commonly found at construction sites such as:</p> <ul style="list-style-type: none"> • Silt fences • Stabilized vehicle entrances/exits (“track-out pads”) • Hay bales, hay swaddles, and silt socks • Management of industrial materials and wastes <p>The training educates employees on these common BMPs and illustrates how they work and how they can fail. After the training, employees will be able to act as spotters for the environmental compliance department.</p> <p><u>Target Audience</u> includes appropriate personnel from: Development Services – Plan and Review and Public Works-Engineering CIP</p>
<p>Rain Check – Municipal Operations (Permit section 6.4.6.f)</p>	<p>The goal of the program is to prevent or reduce pollutant runoff from municipal operations due to activities including but not limited to: park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.</p> <p>This training focuses on the following types of BMPs:</p> <ul style="list-style-type: none"> • Good housekeeping & spill prevention • Spill control & response • Vehicle fueling • Vehicle & equipment maintenance • Vehicle & equipment washing • Materials management • Waste management • Municipal facility maintenance • Parking lots & streets • Storm drain system cleaning • Landscaping & grounds maintenance • Working over or near surface waters <p><u>Target Audience</u> includes appropriate personnel from: Fleet Maintenance and Parks & Recreation</p>

7.2 TRAINING FREQUENCY

The Town conducts annual training for new employees and an annual refresher training to existing employees on the topics identified in Section 7.1. Training is also provided when employees are assigned new operations, tasks, equipment, or protocols.

7.3 TRAINING METHOD

Training may be provided by one or more of the following methods:

- Incorporated into existing training programs (i.e. safety, materials handling, new employee orientation, etc.).
- Established through on-the-job awareness and reinforcement (stormwater pollution prevention posters, paycheck inserts, articles on the Town's internal website, etc.).
- Provided by more customary training such as in-house workshops or presentations.

7.4 TRAINING MEASURABLE GOALS

The measurable goal for all training BMPs is to track and report the number of employees trained during each reporting period.

8.0 ANALYTICAL MONITORING

Permit section 8.0 requires monitoring for small MS4s that discharge to impaired waters with established Total Maximum Daily Load(s) (TMDLs), and Outstanding Arizona Waters (OAWs). The Town's MS4 ultimately drains to the Gila River. At this time, the Gila River is not listed on Arizona's 303(d) list and there is no established TMDL nor is it classified as an OAW; therefore, the Town's SWMP does not include provisions for stormwater monitoring. The SWMP will be updated annually, and analytical monitoring provisions will be added in the future if necessary.

9.0 REPORTING REQUIREMENTS

This section describes the reporting requirements as outlined in the Permit.

9.1 ANNUAL REPORT

The Town will submit its required report annually by September 30 of each year. The report will include:

- Status of compliance with Permit conditions
- Updates regarding mapping requirements (including percent complete)
- Assessment of the effectiveness of the BMPs
- Assessment of the progress towards achieving the measurable goals for each of the six minimum control measures (including description of the targeted message for each audience, distribution method and dates, and program evaluation method)
- Description of the activities used to promote public participation

- The status of any plans or activities required by the IDDE programs, including results of illicit discharge potential protocols, number of illicit discharges located, number of illicit discharges removed, and employee training.
- A summary of the findings of outfall screening and monitoring data collected, as well as DMRs
- The status of any plans or activities required by General Monitoring Program
- Status of the construction runoff management including number of project plans reviewed, number of inspections, and number of enforcement actions.
- Status of stormwater management for new development and redevelopment
- Status of ordinance development and review
- Status of the operation and maintenance programs (6.4.6.1)
- Description of any changes in identified BMPs or measurable goals
- Description of activities to be conducted during next reporting cycle

9.2 DISCHARGE MONITORING REPORTS

The Town will provide DMRs with each annual report. Should an illicit discharge be confirmed while performing dry or wet weather visual monitoring, the Town will also include the following information on the DMR:

- Location of discharge and its source(s)
- Description of the discharge
- Estimated illicit discharge duration
- Method of discovery
- Date of discovery
- Date of elimination
- Mitigation or enforcement action
- Responsible person (if known)
- Estimated volume

The DMR will be submitted along with the annual report no later than September 30 of each year.

9.3 OTHER REPORTING

Per Permit section 9.12 the Town is required to:

- Notify ADEQ of any noncompliance to the Permit which may endanger human health or the environment;

- Give notice to ADEQ as soon as possible of any planned physical alterations or additions to permitted facilities;
- Give advance notice to ADEQ of any planned changes that may result in noncompliance with permit requirements, and
- Contact ADEQ if the Town becomes aware that relevant information in the NOI or any other submitted report was not included.

10.0 SWMP REVISION

Gilbert retained the services of Amec Foster Wheeler to assist the Town in its preparation of the Notice of Intent (NOI) and SWMP in order to comply with the 2016 Permit.

The SWMP is meant to be a living document and updated as conditions change. A list of Plan revisions will be included within this Section as future SWMP revisions are made.

11.0 PROGRAM ASSESSMENT

The Town or their contractor will annually evaluate Town performance against the SWMP. All BMPs will be assessed for appropriateness and effectiveness by analyzing their established goals (see Tables 1 through 6). If necessary, ineffective or infeasible BMPs may be modified or replaced, however documentation of why the BMP was insufficient, expectation of the replacement BMP, and why the replacement BMP will meet the defined goals is required within the SWMP. Adding components or controls to BMPs can be done at any time. The self-evaluation will be included in Attachment H as well as submitted to ADEQ as part of the annual report.

12.0 RECORD KEEPING

The Town will keep all records pertaining to the Permit for a minimum period of 3 years. The records will include all reports, follow up documentation, inspection records, enforcement actions, and data used in the development of the notice of intent.

13.0 PLAN AVAILABILITY

A hardcopy of the Town's SWMP is kept at the Town Hall for public viewing during normal business hours. The Town's plan is also maintained online and accessible to the public. The SWMP can be viewed at: <https://www.gilbertaz.gov/departments/public-works/environmental-compliance/storm-water-quality/municipal-permits>.

14.0 TABLES

Table 1 – Public Education and Outreach BMPs

BMP Category	BMP Responsibility and Description	Measurable Goals (Audience)	BMP Frequency
1.1 Local Outreach Group	<p>Public Works Town will partner with a local outreach group, STORM, or others to conduct public outreach activities. Town will maintain membership and participate in regional outreach efforts.</p>	<p>Document outreach efforts that affect Town residents each year. Summarize activity and number of citizens reached. (General public)</p>	<p>Two outreach efforts per year minimum.</p>
1.2 Printed Materials	<p>Development Services Identify priorities for stormwater brochures.</p> <p>A Identify target audience for brochures.</p> <p>B Develop and print brochures.</p> <p>C Handout Stormwater brochures and related material at Gilbert Water Festival and other Town events.</p>	<p>A Document events where Stormwater Management materials are distributed to the public. (Homeowners, contractors, event attendees, and children)</p> <p>B Record number of brochures distributed.</p>	<p>Two times per year minimum.</p>
1.3 Town Website	<p>Information Technology</p> <p>A Provide updated SWMP and NOI on the Town’s website.</p> <p>B Provide a link to the STORM website which contains stormwater related articles and calendar of stormwater related events.</p> <p>C Provide a method to receive public complaints on the website.</p>	<p>A Document updates of website, articles used, and dates of publication. (General public)</p> <p>B Document complaints received and actions taken.</p>	<p>Website available year-round.</p>

Table 2 – Public Involvement and Participation BMPs

Best Management Category	BMP Responsibility and Description	Measurable Goals	BMP Frequency
2.1 Local Outreach	<p>Public Works Town will contact HOAs and businesses to provide stormwater quality information.</p>	<p>Town will contact a minimum of 5% of businesses and 10% of HOAs each year. Town shall record efforts and include in annual report.</p>	<p>One time per year minimum.</p>
2.2 Volunteer Opportunities	<p>Development Services Town will provide volunteer opportunities for the public to participate in stormwater related volunteer efforts.</p>	<p>A Town will advertise opportunity through the website. B Record all volunteer opportunities and number of participants in attendance at each event.</p>	<p>One volunteer opportunity minimum per year.</p>
2.3 Implement Public Notice	<p>Public Works The Town will comply with state and local public notice requirements when implementing the SWMP.</p>	<p>Document public notice efforts.</p>	<p>One per SWMP update.</p>
2.4 Procedures for Receiving and Reviewing Public Comment	<p>Public Works Continue accepting public complaints and comments through the stormwater website.</p>	<p>A Document the number of website complaints regarding stormwater related issues. B Document resolution of problems/ incidents.</p>	<p>Ongoing as complaints are received.</p>

Table 3 – Illicit Discharge Detection and Elimination BMPs

Best Management Practice	BMP Responsibility and Description	Measurable Goals	BMP Frequency
3.1 Eliminating Illicit Discharges	<p>Public Works Illicit discharges will be identified through various sources and investigated thoroughly as outlined in the IDDE SOP (Attachment K).</p>	<p>A Town will initiate an investigation on 100% of stormwater related complaints. B Town will provide in the annual report the number of IDs that were investigated.</p>	Annually.
3.2 Stormwater System Mapping	<p>GIS Department Maintain Town-wide stormwater system map as part of GIS. The Town map has been completed and updates to stormwater system will be incorporated into GIS.</p>	<p>A Add new features to GIS as they are accepted by the Town. B Track illicit discharges to potential source. C Report number of database updates performed each year.</p>	GIS database kept up-to-date.
3.3 Dry Weather Screening	<p>Public Works A Town will perform dry weather inspections of outfalls in order to identify and follow-up with potential illicit discharges. B Track and eliminate any illicit discharges found.</p>	<p>A 20% of outfalls inspected per year B Remove illicit discharges. Maintain inspection/removal documentation.</p>	<p>A. 20% per year B. Investigate and eliminate identified IDs.</p>
3.4 Wet Weather Monitoring	<p>Public Works Discharge at selected outfalls will be visually monitored after storm events 2 times during each wet season, at 5 separate locations.</p>	<p>A Inspection reports will be filled out for each inspection. B DMRs will be completed and submitted with the annual report.</p>	<p>Two times from June 1st – October 31st and 2 times from November 1st to May 31st.</p>

Best Management Practice	BMP Responsibility and Description	Measurable Goals	BMP Frequency
3.5 Unpermitted Facilities and Activities	<p>Public Works Identification of facilities that need coverage under AZPDES permits. Construction site coverage will be verified through routine inspections and plans review. The Town will verify coverage under industrial permits site.</p>	<p>A Twelve construction sites per year will be audited for construction stormwater permit coverage. B Analysis of new industrial sites within the Town's limits to verify AZPDES permit coverage where application.</p>	<p>A Ongoing construction site verification. B Annual industrial site verification. C Notification to ADEQ as sites are identified.</p>
3.6 Staff Training	<p>Public Works Yearly training of applicable staff of wet and dry inspections, unpermitted discharges, and general stormwater awareness.</p>	Town will record number of staff who received training.	One time per year minimum.

Table 4 – Construction Site Runoff Control BMPs

Best Management Practice	BMP Responsibility and Description	Measurable Goals	BMP Frequency
4.1 Construction Site Inventory	Public Works Town maintains an inventory of all active construction projects.	Town will maintain a searchable inventory using tracking software, EnerGov/Lucity.	Ongoing with updates performed as necessary.
4.2 Written Procedure for plans review	Public Works A written procedure is provided for consistency in plans review and to inform developers of the requirements of a plan.	Procedure developed and maintained. The procedure will be reviewed as necessary for effectiveness.	Ongoing.
4.3 Inspection and Enforcement Procedures	Public Works Town will inspect construction sites for stormwater compliance.	Town will inspect 100% of new construction sites.	Each site will be inspected One time minimum.
4.4 Contractor and Operator Education	Public Works Contractors are provided a brochure that details stormwater pollution prevention information specific to construction site runoff.	Town will record number of brochures printed per year and onsite training provided each year.	Ongoing with onsite training as needed.
4.5 Staff Training	Development Services Conduct training of inspectors and plan review staff on general compliance to stormwater pollution prevention. Review/revise current training program to ensure program effectiveness.	Document the date of training and participants involved. Document any changes made to current program.	One time per year minimum.

Table 5 – Post Construction Runoff Control BMPs

Best Management Practice	BMP Responsibility and Description	Measurable Goals	BMP Frequency
5.1 Stormwater Control Inventory	GIS Department New Public and Private stormwater as-built BMPs will be entered into the Town's GIS database.	Maintain current inventory of stormwater controls.	Ongoing as plans are finalized.
5.2 Inspection and Enforcement Procedure	Public Works Town will follow Enforcement Response Plan as described in section 4.1. Review/revise ordinances to address issues with noncompliance to SWMP.	A Review/revise ERP. B Document enforcement actions. C Perform inspections.	A One time per year minimum. B Annually. C Ongoing.
5.3 Site Plan Review Procedures	Development Services Review Site Plan when as-built plans are submitted. Ensure plans meet design guidelines.	A Record number of plans approved. B Document any changes to Site Plan review procedures.	A Ongoing plan review. B Annual review of site plan procedures.
5.4 Staff Training	Development Services Town will provide training to applicable staff to enforce inspection requirements and O&M requirements for post-construction BMPs.	Report number of employees trained each year.	One time per year minimum.

Table 6 – Pollution Prevention/Good Housekeeping BMPs

Best Management Practice	BMP Responsibility and Description	Measurable Goals	BMP Frequency
6.1 O&M Procedures	<p>Public Works A Continue Street Sweeping program. B Continue SW infrastructure maintenance and cleaning program. C Continue implementing pollution prevention practices in the maintenance program.</p>	<p>A Document number of line-miles swept and tonnage of materials removed. B Document number of system components cleaned. C Document pollution prevention practices implemented.</p>	<p>A Streets will be swept once per month minimum. B Ongoing as needed. C Ongoing as needed.</p>
6.2 Municipal Operations Inventory	<p>Public Works Review list of town buildings and properties. Prioritize for inspections.</p>	<p>Document review and prioritization.</p>	<p>Review and prioritize – once per permit cycle.</p>
6.3 Facility Inspections	<p>Public Works Town will inspect facilities based upon prioritization to identify pollution prevention practices needed.</p>	<p>Inspect facilities based upon prioritization.</p>	<p>Inspect - Low priority facilities inspected 20% per year, Medium priority facilities inspected yearly, and high priority facilities inspected quarterly.</p>
6.4 Implement Pollution Controls	<p>Public Works During facility inspections, inspector will identify if additional pollution controls are needed.</p>	<p>Town will record observations on Facility Inspection Form.</p>	<p>All facilities will be reviewed as per facility prioritization.</p>

Best Management Practice	BMP Responsibility and Description	Measurable Goals	BMP Frequency
6.5 Staff Training	Public Works Conduct training of Town employees on the proper maintenance of the storm drain system and illicit discharges. Review/revise current training program for proper maintenance of stormwater system and illicit discharges.	Document the date of training and participants involved. Document any changes made to current program.	One time per year minimum.

FIGURES



ATTACHMENT A

ACRONYMS AND DEFINITIONS

ACRONYMS

The following is a list of acronyms and abbreviations that are used in this document.

AAC	Arizona Administration Code
ADEQ	Arizona Department of Environmental Quality
ARS	Arizona Revised Statutes
AZPDES	Arizona Pollutant Discharge Elimination System
BMP(s)	Best Management Practice(s)
CWA	Clean Water Act
DMR	Discharge Monitoring Report
ERP	Enforcement Response Plan
GIS	Geographic Information System
IC	Illicit Connection
ID	Illicit Discharge
IDDE	Illicit Discharge Detection and Elimination
MCM(s)	Minimum Control Measure(s)
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
MSGP	Multi-Sector General Permit
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
OAW	Outstanding Arizona Waters
SIC	Standard Industrial Classification
SOP	Standard Operating Procedure
STORM	Stormwater Outreach for Regional Municipalities

SWMP	Stormwater Management Plan
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load

DEFINITIONS

Arizona Pollutant Discharge Elimination System (AZPDES) - The ADEQ implementation of the EPA program for issuing, modifying, revoking, reissuing, terminating, monitoring, and enforcing permits and imposing and enforcing pretreatment requirements under the Clean Water Act.

Best Management Practices (BMPs) - Measures or practices used to prevent or minimize the amount of pollution entering surface waters. BMPs may take the form of a process, activity, or physical structure.

Discharge - The conveyance, channeling, runoff, or drainage stormwater, including snowmelt, from a site.

Minor Spills - Spills that have a volume less than the reportable quantity, can be controlled and cleaned up with onsite resources, do not contaminate the environment, and do not cause injury to personnel.

National Pollutant Discharge Elimination System (NPDES) - The EPA program for issuing, modifying, revoking, reissuing, terminating, monitoring, and enforcing permits and imposing and enforcing pretreatment requirements under the Clean Water Act.

Non-stormwater discharge - Any discharge not comprised entirely of stormwater except discharges authorized by a NPDES/AZPDES permit.

Outfall - Any discernible stormwater conveyance (e.g., pipe, ditch, swale, canal) that discharges to waters of the state or to a separate municipal storm system. See also point source discharge.

Point Discharge - Any discernible, confined, and discrete conveyance, including pipes, ditches, channels, tunnels, conduits, and wells.

Pollutant - Any dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discharged equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into stormwater.

Precipitation - Any form of rain or snow.

Run-on - Stormwater surface flow or other surface flow that enters the site other than that where it originated.

Runoff - Part of precipitation, snowmelt, or irrigation water that runs off the land into streams or other surface water. It can carry pollutants from the air and land into the receiving waters.

Stormwater - Stormwater runoff, snowmelt runoff, and surface runoff and drainage.



ATTACHMENT B

NOTICE OF INTENT



ATTACHMENT C

ORGANIZATIONAL CHART AND RESPONSIBILITIES

Division/Section	Current Activity	Potential Future Role/ Responsibility for SWMP Implementation
Public Works Department – Field Operations Division		
Wastewater	Detection of illicit connections and illicit discharges from commercial and industrial sources; literature/information to businesses on proper disposal of liquid wastes for the sanitary drainage.	Industrial and Commercial Program Elements (post- construction inspections and education) similar to established programs expanded to include the storm drainage system; pollution prevention (P2) opportunities specific to Wastewater Section, Illicit Connection
Streets	Maintain scuppers and catch basins to avoid overflows that could affect surface water quality; perform annual cleaning of catch basins; investigate complaints of illegal dumping and connections; Street Sweeping Program; right-of-way and median maintenance programs.	Catch Basin Cleaning Program (improvements to existing program); Illicit Connection and Discharge Program (formal training); Dry Well inspection program;
Solid Waste	Provide refuse and recycling services; organize household hazardous waste (HHW) drop-off days.	P2 opportunities specific to Solid Waste Section; increased involvement in Public Education areas
Fleet Service	Public Works yard maintenance; equipment maintenance and repair BMPs	P2 opportunities specific to Fleet Service Section
Building Maintenance	Provide building-related repairs on a timely basis; maintenance of on-site stormwater controls (dry wells, retention basins, gutters, etc.)	P2 opportunities specific to building maintenance; P2 education of building tenants (providing literature, info, etc.)
Environmental Programs	Assist all divisions with educational and outreach efforts on recycling, refuse collection and disposal; industrial waste issues; training.	Coordination of SWMP components; Public Education and Outreach Program; development of Municipal Operations BMPs
Public Works Department – Engineering Division		
Planning	Review new development and redevelopment projects for compliance with Town codes	Prepare General Plan, revisions and amendments; Post-construction activity / long-term maintenance program involvement; SWPPP program coordination
Engineering	Review new development and redevelopment projects including stormwater impacts; recording of data onto as-built plans including stormwater conveyances (retention basins, drywells); conducts land development review	Design and construction of storm drain system improvements; transfer of as- built data to Town database system; storm drain plan development to coordinate storm drain water quality planning efforts locally and regionally; SWPPP review



ATTACHMENT D

FORMS

**Outfall Inspection and Visual Monitoring Field Report
Construction Site Inspection Form
Post Construction Site Inspection Form
Municipal Facility Inspection Form
Municipal Vehicle Maintenance and Repair Facility Inspection Form**



ATTACHMENT E

PROCESS FLOWCHARTS



ATTACHMENT F

COMPLETED FORMS



ATTACHMENT G

TRAINING RECORDS



ATTACHMENT H

SELF-EVALUATION RECORDS



ATTACHMENT I

ORDINANCES



ATTACHMENT J

ENFORCEMENT RESPONSE PLAN



ATTACHMENT K

IDDE STANDARD OPERATING PROCEDURES



ATTACHMENT L

MUNICIPAL FACILITIES



ATTACHMENT M

MS4 PERMIT