

City of Conway Stormwater Management Plan (SWMP)

PO Drawer 1075 Conway, SC 29528 (843) 248-1730

June 30, 2014

Prepared in accordance with SCDHEC Permit #SCR030000

CERTIFICATION OF STORMWATER MANAGEMENT PLAN

I certify that the City of Conway has taken the necessary steps to obtain and maintain full legal authority to implement and enforce each of the requirements contained in the NPDES General Permit for Storm Water Discharges from Regulated Small Municipal Separate Storm Sewer Systems (SMS4), Permit Number SCR030000.

Bill Graham		City Administrator	
Name (Print)			Title
Rill.	Snalm	June 30, 2014	
Signature	1000	Date	

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Appendices

Appendix A: City of Conway Stormwater Management Ordinance

Appendix B: Carolina Clear Contract

List of Acronyms and Abbreviations

BMP Best Management Practice

CEPSCI Certified Erosion Prevention and Sediment Control Inspector

CSR Construction Site Runoff

EPA Environmental Protection Agency

ERP Enforcement Response Plan

IECA International Erosion Control Association

IDDE Illicit Discharge Detection and Elimination

MCM Minimum Control Measure

MEP Maximum Extent Practicable

MS4 Municipal Separate Storm System

NOI Notice of Intent

NPDES National Pollutant Discharge Elimination System

PCR Post Construction Runoff

PEO Public Education and Outreach

PIP Public Involvement and Participation

PP&GH Pollution Prevention and Good House Keeping

SCDHEC South Carolina Department of Health and Environmental Control

SMS4 Small Municipal Separate Storm System

SOP Standard Operating Procedure

SWMP Stormwater Management Plan

SWP3 Storm Water Pollution Prevention Plan

TMDL Total Maximum Daily Load

City of Conway, South Carolina NPDES Stormwater Management Plan (SWMP)

1.0 Introduction

This Stormwater Management Plan (SWMP) is designed to reduce the discharge of pollutants from the City of Conway's Small Municipal Separate Storm Sewer System (SMS4) to the maximum extent practicable, to protect water quality and to satisfy the appropriate requirements of the Clean Water Act. The contents are expected to change with time due to the iterative process of developing the SWMP recognized by the Environmental Protection Agency (EPA) and the South Carolina Department of Health and Environmental Control (SCDHEC). EPA predicts that it will likely take two to three SMS4 permit terms (5-year terms) to fully develop and implement the SWMP. The first permit term focused heavily on data collection, organization, development of necessary programs, and initial implementation. During the current second SMS4 permit cycle, the SWMP will need to be amended based on the observed effectiveness of existing plan components and to address the terms and conditions of the new permit. This document is meant to be a living document that will be revisited on an annual basis to reflect accomplishments, potential revisions to plan components, and additions of other or expanded efforts.

This SWMP addresses the requirements of the NPDES General Permit for Discharges from Regulated SMS4s; Permit No. SCR030000, effective January 1, 2014 and expiring December 31, 2018. Specific language from the SMS4 general permit has been copied and pasted into this SWMP for consistency. The section numbers used in this SWMP correspond with the general permit section numbers.

Updates to the SWMP will be included in a revisions sheet in Appendix A.

2.0 Notice of Intent (NOI) Information

The following information is applicable to the City of Conway.

Table 1: NOI Table

General Permit Section	NOI Information	Description
2.2.1 Infor	mation on the Permit	tee:
	Name of Municipality:	City of Conway
2.2.1.1	Mailing Address:	City of Conway Public Works Department PO Box 1075 Conway, SC 29528
	Telephone Number:	843-248-1730

General			
Permit	NOI Information	Description	
Section			
2.2.1.2	Public Entity Type:	City	
2.2.2 Info	rmation on the SMS4:		
		SMS4 Location: City of Conway	SMS4 Center Coordinates: Latitude: N33° 50' 43.422"
			Longitude: W79° 2' 7.07"
		SMS4 Urbanized Area: 22.8 square miles	
2.2.2.1	Map of City of Conway:	Everate favore Everate favore	
2.2.2.2	Major Receiving Waters:	Brown Swamp*, Crab Tree Kingston Lake*, Mapel Swa Swamp, Waccamaw River*	amp, Ned Creek, Oakey
2.2.2.3	Indian Lands:	No portion of City of Conw Country Lands.	vay's MS4 is located on Indian
2.2.2.4	List of Significant Entities within City	The following entities ope system within the SMS4 are	rate a separate storm sewer ea of the City of Conway.
	of Conway:	Highway Entities: • SCDOT	
2.2.2.5 2.2.2.6 *Listed on the CWA	BMP Information:	minimum measure. Each i available information on t implemented, their measu	ussion of the BMPs for each minimum measure contains all he BMPs that are to be urable goals, a schedule for I the person(s) responsible.

^{**}Allocated a TMDL

3.0 Special Conditions Applicable to Permitted Stormwater Discharges to Sensitive Waters

The SMS4 permit requires that the City of Conway determine whether its systems discharge to sensitive waters. For the purpose of the permit, sensitive waters are waters:

- With a Total Maximum Daily Load (TMDL) developed and approved, or established by EPA,
- Included in the most recent SC DHEC Section 303(d) list,
- Pursuant to DHEC Water Classifications & Standards (R.61-68) and Regulations (R.61-69) classified as either:
 - o Outstanding National Resource Waters (ONRW)
 - Outstanding Resource Waters (ORW)
 - o Trout Waters, or
 - o Shellfish Harvesting Waters (SFH), and
- In Source Water Protection Areas (SWPA).

3.1 Determination of Receiving Water Conditions and Impacts

The SMS4 general permit requires the City of Conway to determine whether stormwater discharges from any part of the SMS4 contribute one or more pollutants directly or indirectly to an impaired waterbody that is listed in the most recent South Carolina 303(d) list. The list identifies water bodies that do not currently meet state water quality standards. The list is intended to be used as a tool to determine what types of water quality improvement measures should be taken. To meet this SMS4 general permit requirement, the City of Conway has collected information from SCDHEC on the location of impaired waters, as determined from results of the State's monitoring program, that could potentially be impacted by discharges from City of Conway's SMS4. Table 2 provides a list of the impaired waterbodies on the 2012 303(d) list that the City of Conway's SMS4 contributes to, either directly or indirectly.

Table 2: 2012 303(d) List of Impaired Stations within City of Conway's SMS4 Area

Major Receiving Waters	Station Description	Station	Pollutant of Concern	Proposed TMDL Date
BROWN SWAMP	BROWN SWAMP AT US 701	RS-10389	DO	2022
CRAB TREE	CRAB TREE SWAMP AT LONG ST BL	MD-158	DO	2021
SWAMP	OUTFALL OF CONWAY #1 POND	MD-150	FC	2015
CRAB TREE SWAMP	CRAB TREE SWAMP AT BRIDGE ON US 501 1.5 MI NW OF CONWAY	RS-04375	FC	2015

Major Receiving Waters	Station Description	Station	Pollutant of Concern	Proposed TMDL Date
			DO	2022
KINGSTON LAKE	KINGSTON LK NR PUMP STA ON LAKESIDE DR CONWAY	MD-107	FC	2013 (TMDL to be developed within two years)
WACCAMAW RIVER	WACCAMAW RIVER @ PITCH LANDING	CSTL-556	HG	2025

Please note that the current draft of the 2014 303d list includes no new additional impairments within the City of Conway. In accordance with statewide changes for indicator bacteria from DHEC, the only change is seen in the pollutant of concern where fecal coliform is drafted to change to *E. coli*. There is also a change seen in some of the proposed TMDL dates where they are moved to a later date.

3.2 TMDL Monitoring and Assessment

In compliance with Section 3.2.1 of the SMS4 general permit, TMDL monitoring and assessment plans will be developed for all TMDL waters receiving SMS4 discharges of pollutant(s) of concern, except where Section 3.1.1.2 of the SMS4 general permit is applicable. For TMDLs existing before the effective date of permit coverage, TMDL monitoring and assessment plans will be completed, submitted to SCDHEC, and appended to this SWMP within 12 months of the effective date of permit coverage. For newly established TMDLs, the City of Conway will complete a TMDL monitoring and assessment plan within 12 months of the effective date of the TMDL. As completed, TMDL monitoring and assessment plans will be submitted to SCDHEC and attached to this SWMP in Appendix C. Sampling will be initiated within 18 months of the effective date of permit coverage for TMDLs existing before the effective date of permit coverage. For newly established TMDLs, the City of Conway will initiate sampling within 18 months of the effective date of the TMDL.

Table 3: List of Approved/Under Development TMDLs within City of Conway's SMS4 Area

TMDL Watershed	Pollutant of Concern	Effective TMDL Date
AIWWW- WACCAMAW RIVER	DO	7/27/1999

3.3 TMDL Implementation and Analysis

In compliance with Section 3.3.2 of the SMS4 general permit, TMDL Implementation Plans will be developed for all TMDL waters receiving SMS4 discharges of pollutant(s) of concern, except when Section 3.1.1.2 of the SMS4 general permit is applicable. TMDL Implementation Plans will be completed and submitted to SCDHEC within 48 months from the effective date of permit coverage, or, for TMDLs established after the effective date of permit coverage, within 48 months of the effective date of the TMDL.

3.4 Discharges to Impaired Waterbodies

For impaired water bodies for which no TMDL has been assigned, protection will be provided through BMP applications conducted through implementation of the minimum control measures in section 4.2.

3.5 Discharges to Classified Waters

The City of Conway does not discharge to any classified waters.

3.6 Discharges to Source Water Protection Areas

For discharges to Source Water Protection Areas, protection will be provided through BMP applications conducted through implementation of the six minimum control measures in section 4.2.

4.0 Stormwater Management Plan (SWMP)

Table 4: SWMP Requirements

SWMP REQUIREMENTS				
	Not Started: In	Progress :	Completed:⊠	
Develop and Implement SWMP	Section: 4.	1.2		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Revise and update written SWMP document and submit the SWMP to SCDHEC Bureau of Water.	Deadline: July 1, 2014	Once	Public Works Department	
Update Stormwater Management	Not Started: ☐ In Progress : ☐ Completed: ☐			
Ordinance	Section: 4.1.3			
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Review and revise the Stormwater Management Ordinance, or adopt any new ordinances or other regulatory mechanisms that provide adequate legal authority to control pollutant discharges into and from the SMS4, and to meet the requirements of the MS4 permit.	Deadline: January 1, 2015	Once	Public Works Department	
Develop Enforcement Response Plan	Not Started: ☐ In	Progress:	Completed:	
(ERP)	Section: 4.1.5			
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Implement an enforcement response plan (ERP).	Deadline: January 1, 2015	Once	Public Works Department	

Update Stormwater Management	Not Started: In	Progress:	Completed
Plan	Section: 4.	.1.10	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Review and revise the SWMP document to keep it up to date during the term of the permit.	Throughout the Permit Term	Annually	Public Works Department

4.1.1 Requirements of the NPDES SMS4 General Permit

The City of Conway will implement this SWMP to reduce the discharge of pollutants from its SMS4 to the maximum extent practicable to protect water quality.

4.1.2 SWMP Development

The City will revise and update the written SWMP document and submit the SWMP to the SCDHEC Bureau of Water by July 1, 2014.

4.1.3 Contents of the SWMP

At a minimum, the City must include ordinances, or other regulatory mechanisms, providing the legal authority necessary to implement and enforce the requirements of the SMS4 general permit. See Appendix D for the City of Conway Stormwater Management Ordinance. By January 1, 2015, the City will review and revise the Stormwater Management Ordinance, or adopt any new ordinances or other regulatory mechanisms that provide adequate legal authority to control pollutant discharges into and from the SMS4, and to meet the requirements of the SMS4 general permit.

4.1.4 Requirement to Develop Adequate Legal Authority

At a minimum the legal authority will address the following:

- Authority to Prohibit Illicit Discharges
- Determination of Allowable Non-Stormwater Discharges
- Authority to Prohibit Spills or Other Releases
- Authority to Require Compliance
- Authority to Require Installation, Implementation, and Maintenance of Control Measures
- Authority to Receive and Collect Information
- Authority to Inspect
- Response to Violations
- Monetary Penalties
- Civil/Criminal Penalties
- Interagency Agreements (if applicable)

A certification statement has been included in this SWMP that certifies the City of Conway has taken the necessary steps to obtain and maintain full legal authority to implement and enforce each of the requirements contained in the NPDES SMS4 general permit (see Page i).

4.1.5 Enforcement Measures and Tracking

The City will implement an enforcement response plan (ERP) by January 1, 2015, and revise as necessary. The ERP describes the City of Conway's potential responses to violations and

addresses repeat and continuing violations through progressively stricter responses as needed to achieve compliance.

4.1.5.2 Enforcement Tracking

The City will track instances of non-compliance either in hard-copy files or electronically.

4.1.5.3 Recidivism Reduction

The City will summarize inspection results by consuetudinary violators and include incentives, disincentives, or an increased inspection frequency at the operator's sites.

4.1.6 Report Requirements

The City of Conway will at a minimum submit the following information in the report (See Section 5.3 for details).

- The status of implementing the components of the SWMP that are established as permit conditions;
- Proposed changes to the SWMP that are established as permit conditions;
- Revisions, if necessary, to the assessment of controls and the fiscal analysis, including
 a description of staff resources necessary to meet the requirements of the permit;
- A summary of data, including monitoring data, that is accumulated throughout the reporting year; and,
- A summary describing the number and nature of enforcement actions, inspections, and public education programs.

4.1.7 SWMP Minimum Control Measure Requirements

The City of Conway SWMP will include the following information for each of the six minimum control measures.

Each (MCM) is described in Section 4.2 of this SWMP in detail:

- Best management practices (BMP) that the City of Conway or another entity will implement for each of the MCM;
- Measurable goals for each of the BMP including, as appropriate, the months and years in which the City will undertake required actions, including interim milestones and the frequency of the action; and,
- Person, or persons, responsible for implementing or coordinating the BMP for the City's SWMP.

4.1.10 SWMP Modifications

SCDHEC Bureau of Water may notify the City of Conway of the need to modify the SWMP document to be consistent with the permit, in which case the City of Conway will have 90 days to finalize such changes to the plan.

The City of Conway will keep the SWMP document up to date during the term of the permit. Where the City of Conway determines that Ordinance modifications are needed to address any procedural, protocol, or programmatic change, such changes must be made as soon as practicable, but not later than 360 days.

4.2 Minimum Control Measures

In compliance with the SMS4 general permit requirements; this SWMP includes a description of the six minimum control measures (MCMs) and details on the development and implementation of the plan to address MCM requirements. The details on each minimum measure include the proposed BMP measurable goals for each proposed BMP, the responsible departments and staff to implement the BMP, and the implementation schedule for the BMP (i.e. start date, frequency of activities, etc.)

4.2.1 Public Education and Outreach (Minimum Measure #1)

4.2.1.1 Permit Requirements

In order to meet the requirements of Minimum Measure #1, the City of Conway has partnered with Clemson University/Carolina Clear to focus on the development and implementation of educational programs designed to inform the public about the impacts that stormwater discharges could have on local waterbodies and the steps that the public can take to reduce pollutants in stormwater runoff. The City of Conway intends to work in cooperation with Clemson University/ Carolina Clear in order to efficiently reach as many citizens as economically possible through public education and outreach efforts.

4.2.1.2 BMP Implementation

Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure.

In order to meet the requirements of Minimum Measure #1, the City of Conway will implement the following BMPs:

• Continue Agreement with Clemson University/Carolina Clear to Implement a Public Education and Outreach Program. See Appendix G for Contract.

Table 5: Best Management Practices - Minimum Measure #1

Agreement with Clemson University Cooperative Extension Service -	Not Started:	In Progress :	Completed:	
Carolina Clear	Section:			
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Contract with Clemson University to implement a public education/outreach program for the City of Conway.	Throughout Permit Term	Annually	Public Works Department Clemson University/Carolina Clear	
Measurable Goal: A program that provides public education c of Conway.	oncerning water quality	issues in the wa	tershed area of the Cit	

4.2.2 Public Involvement/Participation (Minimum Measure #2)

4.2.2.1 Permit Requirements

The City of Conway will partner with Clemson University/Carolina Clear in order to efficiently reach as many citizens as economically possible through public involvement and participation efforts. Clemson University/Carolina Clear will provide the citizens of the City of Conway opportunities to participate in activities and events relating to water quality preservation and water quality education.

Table 6: Minimum Measure #2 Permit Requirements

4.2.2.1.1	Create opportunities for citizens to participate in the implementation of stormwater controls:
	Opportunities for citizen participation in the implementation of stormwater controls in the City of Conway will be provided by Clemson University/Carolina Clear.
4.2.2.1.2	Accessing information on this SWMP:
	The City of Conway will include the SWMP on the City's Stormwater Management webpage.
4.2.2.1.3	Incorporate written procedures for implementing the public involvement/participation (PIP) MCM in the SWMP.
	The City of Conway will continue to implement its written procedures (Contract) with Clemson University/Carolina Clear to Implement a Public Involvement and Participation Program

4.2.2.2 BMP Implementation

The measurable goals for each BMP for the Public Participation and Involvement minimum measure will be used to evaluate the success of each BMP. The following sections describe the components of the City of Conway's Public Involvement/Participation program:

In order to meet the requirements of Minimum Measure #2, the City of Conway will:

- Continue to implement its written procedures (Contract) with Clemson University/Carolina Clear to Implement a Public Involvement and Participation Program. See Appendix G for Contract and written procedures.
- Provide Access to Information for the SWMP

Table 7 describes the components of the City of Conway's Public Involvement/Participation program:

Table 7: Best Management Practices - Minimum Measure #2

PUBLIC INVOLVEN	MENT/PARTICIPATI	ON BMPS	AND STREET, CALL
Opportunities for Citizen Participation	Not Started:	In Progress:	Completed:
	Section: 4.2.2.1.1		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Contract with Clemson University to implement a public involvement/participation program for the City of Conway	Throughout Permit Term	Annually	Public Works Department Clemson University/Carolina Clear
A program that will provide the citizens of the events relating to water quality preservation.			icipate in activities and
Provide Access to Information for the	Not Started:⊠	In Progress:	Completed:
SWMP	Section: 4.2.2.1.2		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Ensure the public can easily find information about the SWMP.	Deadline: December 31, 2014	Once during permit term	Public Works Department

Measurable Goal:			
The City of Conway will include the SWMP on	the City's webpage.		
Written Procedures for Implementing	Not Started: ☐ In Progress : ☐ Completed: ☐		
MCM#2	Section: 4.2.2	2.1.3	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Develop written procedures for implementing the public involvement program.	Throughout Permit Term	Annually	Public Works Department Clemson University/Carolina Clear
Measurable Goal:			
Signed Contract with Clemson University/Car	olina Clear.		

4.2.3 Illicit Discharge Detection and Elimination (Minimum Measure #3)

4.2.3.1 Permit Requirements

The City of Conway will locate and eliminate illicit discharges by developing BMPs in accordance with the SMS4 general permit requirements. Priority areas will be established based on the higher likelihood of illicit connections, and outfalls located within the priority areas will be visited to check for dry weather flow. Outfalls with dry weather flow will be screened to identify potential illicit discharges. Prior to illicit tracking activities, the City will develop illicit tracking procedures. After illicit tracking procedures have been established, illicit discharges will be tracked to a source and eliminated when possible. Illicit tracking activities will be documented for review.

Table 8: Minimum Measure #3 Permit Requirements

4.2.3.2.1	Development of the storm sewer system map:
	The City of Conway will develop a storm sewer system map showing the location of known outfalls, and names and locations of all waters of the United States that receive discharges from those outfalls. The storm sewer map will be updated as needed to show new outfalls due to new developments.
4.2.3.2.2	Identification of priority areas:
	The City of Conway will identify priority areas for more detailed screening of the SMS4 based on the outfall inventory.
	The City will document the basis for its selection of each priority area and create a list of all

priority areas identified in the system no later than 12 months after the effective date of permit coverage. The priority area list will be updated *annually* to reflect changing priorities and be available for review by the permitting authority.

4.2.3.2.3.a Field screening procedures and implementation:

The City of Conway will conduct dry weather field screening and / or analytical monitoring, when necessary, to identify the source of illicit discharges. At a minimum, The City of Conway will:

Identify all field screening points within the priority areas where field screening and analytical monitoring will take place. A list of screening points will be developed. The City will also conduct field screening and analytical monitoring outside the priority areas at known non-stormwater discharges. The areas and the schedule for conducting the screening, and field screening points will be identified annually.

The City of Conway will develop dry weather screening procedures which:

Provide a description of which screening methods will be used and a description as to why it is appropriate;

Provides a description of field screening equipment with respective methodologies for use; and All dry weather screening activities will be conducted after 72-hours of continuous dry conditions following at least 0.10 inch of rainfall.

The elimination of all illicit discharges will be documented. Documentation procedures will be developed as described in section 4.2.3.2.5/6

4.2.3.2.3.b Field screening assessment:

The City of Conway will assess the effectiveness of the Field Screening component of their IDDE program in the third permit year to determine if the level of effort is adequate in attaining the effective prohibition of non-stormwater discharges into the MS4. Where updates are found to be necessary, The City of Conway will make such changes and include them as part of the renotification required under Part 2.5 of Permit SCR030000.

4.2.3.2.3.c Procedures for notifying another MS4 of an illicit discharge:

For non-traditional MS4 permittees, if illicit connections or illicit discharges are observed related to another operator's municipal storm sewer system then The City of Conway will notify the other operator as soon as practical.

4.2.3.2.3.d Addressing a notification of an illicit discharge by another operator:

The City of Conway will follow appropriate procedures when notified of an illicit discharge by another MS4 operator.

4.2.3.2.4/5 Tracing the source of an illicit discharge:

The City of Conway will develop procedures for conducting illicit tracking and elimination procedures.

After becoming aware of an illicit discharge, The City of Conway will initiate an investigation(s) to attempt to identify and locate the source of any continuous or intermittent non-stormwater discharge on as soon as practical.

The City of Conway will report immediately the occurrence of any dry weather flow believed to be an immediate threat to human health of the environment to SC DHEC Emergency Response, 1-888-481-0125.

Illicit Discharges suspected of being sanitary sewer system overflows and/or significantly contaminated will be considered a high priority and will be reported to appropriate public utility owner within 24 hrs.

Investigations of illicit discharges suspected of being cooling water, wash water, or natural flows may be delayed until after all discharges suspected of having the potential for adversely impact either human health or water quality have been investigated, eliminated, and/or resolved.

At a minimum, The City of Conway will document the date(s) the illicit discharge was observed; the results of the investigation; any follow-up of the investigation; and the date the investigation was closed.

4.2.3.2.6 Determining the source of the illicit discharge:

The City of Conway will determine and document through their investigations the source of all confirmed illicit discharges. If the source of the suspected illicit discharge is found to be a suspected non-compliance with an NPDES permit, the appropriate SCDHEC Regional Office will be notified.

- a. If an illicit discharge is found, but within six (6) months of the beginning of the investigation neither the source nor the same non-stormwater discharge has been identified/observed, then The City of Conway will maintain written documentation for review by the permitting authority.
- b. If the observed discharge is intermittent, The City of Conway will document that a minimum of three (3) separate investigations were made to observe the discharge when it was flowing. If these attempts are unsuccessful, The City of Conway will maintain written documentation for review by the permitting authority. However, since this is an ongoing program, The City of Conway will periodically recheck these suspected intermittent discharges.

4.2.3.2.7 Corrective Action plan to eliminate illicit discharges:

Once the source of the illicit discharge has been determined, The City of Conway will:

- a. Notify the responsible party of the problem as soon as practical but no later than 3 business day.
- b. Require the responsible party to conduct all necessary corrective actions to eliminate the nonstormwater discharge within 30 days. When, and if, elimination will take longer than 30 days, The City of Conway will require responsible parties to submit a plan with a schedule for elimination
- c. Conduct a follow-up investigation and field screening, consistent with Part 4.2.3.4/5 of this SWMP, to verify that the discharge has been eliminated.
- d. Document their follow-up investigations.
- e. Follow the SWMP ERP and include the resulting enforcement actions in the subsequent report.

4.2.3.2.8 Public reporting mechanism:

The City of Conway will establish an illicit reporting hotline for the public and staff to report illicit discharges.

The City will establish and implement citizen request response procedures in the illicit tracking procedures document created for section 4.2.3.2.4/5. The citizen response procedures in the illicit tracking procedures document will:

- a. Develop a written spill/dumping response procedure for responding to public notices of illicit discharges, the various responsible agencies and their contacts, and who would be involved in illicit discharge incidence response.
- b. Include procedures for inspections in response to complaints and follow-up inspections as needed to ensure that corrective measures have been implemented by the responsible party to achieve and maintain compliance.

4.2.3.2.9 Employee training:

The City of Conway will implement a training program for all appropriate municipal staff, which, as part of their normal job responsibilities, may come into contact with, or otherwise observe, an illicit discharge or illicit connection to the storm sewer system. This BMP will be implemented through training for Pollution Prevention in Section 4.2.6.5

4.2.3.2 BMP Implementation

The following BMP's were developed by considering the permit requirements listed in Table 9. In order to meet the requirements of Minimum Measure #3, the City of Conway has listed BMPs that focus on the detection and elimination of illicit discharges into the SMS4. Evaluation of the success of this minimum measure will be based on the level of implementation of the BMPs included in this minimum measure. The responsibility for implementation of this minimum measure is described with each BMP procedure. The following sections describe the components of the City's Illicit Discharge Detection and Elimination (IDDE) program. The screening procedures for the IDDE program will be included in Appendix E once complete.

In order to meet the requirements of Minimum Measure #3, the City of Conway will:

- Update Legal Authority for IDDE
- Update the Storm Sewer Map
- Identify Priority Areas for Illicit Discharges
- Identify Screening Points
- Conduct Field Screening (Dry Weather Screening)
- Develop Illicit Tracking Procedures
- Conduct Illicit Tracking
- Eliminate Illicit Discharges
- Document Illicit Discharge Investigations
- Assess Field Screening Procedures
- Provide Employee Training on Illicit Discharge Identification

Table 9 describes the components of the City of the Conway's Illicit Discharge Detection and Elimination (IDDE) program.

Table 9: Best Management Practices - Minimum Measure #3 -

	DDE BMPs		
Hadata Law Livida with San IDDE	Not Started: ☐ In Progress : ☐ Completed: ☐		
Update Legal Authority for IDDE	Section:	4.2.3.2	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Update the Ordinance, where necessary, to procure the legal authority to implement a program to detect, investigate and eliminate non-stormwater discharges including illegal dumping into its system.	Deadline: December 31, 2014	As Needed	Public Works Department
Measurable Goal:			
Update regulatory requirement when necess	sary.		
Update Storm Sewer Map	Not Started:	In Progress :	Completed:
opuate storm sewer map	Section: 4.2.3.2.1		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Update the storm sewer map as needed to show the location of all outfalls and names and locations of all waters of the United States that receive discharge from those outfalls.	Current map complete	As Needed	Public Works Department
Measurable Goal:		1	F
Update storm sewer map as needed to show	new outfalls.		
Line of December 1	Not Started:	In Progress :	Completed:
Identify Priority Areas	Section: 4	.2.3.2.2	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Create a map of illicit priority areas based on an identification of areas with a higher likelihood of illicit connections. The map will be updated annually.	Deadline: December 31, 2014	Annually	Public Works Department
Measurable Goal:			
A map which sets the boundaries for SMS4 Di	ry-Weather Screening		

11	Not Started:⊠	n Progress :	Completed:	
Identify Screening Points	Section: 4.	2.3.2.3a	a	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Identify all field screening points within the priority area. Include a schedule for conducting the screening. Update the field screening portion of the IDDE program to include elements listed section 4.2.3.2.3.a.	Deadline: December 31, 2014	Annually	Public Works Department	
Measurable Goal:				
A list of all field screening points.				
A schedule for conducting the field screening	ıg.			
Update the field screening portion of the ID	DE program.			
Conduct Field Screening	Not Started: 🗵 🛚	n Progress :[Completed:	
Conduct Field Screening	Section: 4.	2.3.2.3a		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Conduct dry weather flow screening at outfalls in the priority area and at known dry weather discharges. The implementation of this program will be described in the IDDE Guidance document once it is developed/revised.	Deadline: June 31, 2015	Annually	Public Works Department	
Measurable Goal:		1	<u> </u>	
Locate potential illicit discharges in the price	ority area.	No all		

Develop High Typeking December	Not Started 🔯 1	n Progress :	Completed:
Develop Illicit Tracking Procedures	Section: 4.2.3.2.4/5/8		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
The City of Conway will develop procedures for tracking illicit discharges. The illicit tracking procedures will include minimum investigation requirements in section 4.2.3.2.5. In addition, the illicit tracking procedures will include requirements for responding to public notices. (section 4.2.3.2.8.a/b)	Deadline: December 31, 2014	Once during permit term	Public Works Department
Measurable Goal:			
Develop illicit tracking procedures.			
Conduct Illicit Tracking/Determine Source of Illicit Discharge	Not Started:⊠ I	n Progress :	Completed:
	Section: 4.	2.3.2.4/5	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
The City of Conway will conduct illicit tracking at outfalls identified as potential illicit discharges by the field screening effort.	Confirmed illicit discharges will be tracked within a timeframe listed in section 4.2.3.2.4/5	As Needed	Public Works Department
Measurable Goal:			
Determine source of potential illicit discharge	ges identified during fie	ld screening.	
Eliminata Illigit Discharges	Not Started:⊠ I	n Progress :	Completed:
Eliminate Illicit Discharges	Section: 4.	2.3.2.7	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Once the source of an illicit discharge has been determined, the City of Conway will follow procedures (a-e) of section 4.2.3.2.7 of the permit to eliminate the illicit discharge.	Confirmed illicit discharges will be eliminated within the timeframe listed in section 4.2.3.2.7.b	As Needed	Public Works Department
Measurable Goal:	1		
Documentation of eliminated illicit discharge	es.		

Document Illicit Discharge	Not Started Not 1	n Progress :	Completed:
Investigations	Section: 4.2.3.2.5/6		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
The City of Conway will document illicit discharge tracking and elimination activities to include the following information: Date(s) the illicit discharge was observed Results of the illicit investigation Results of any follow-up investigations; Date the investigation was closed. Source of illicit discharge Documentation for unresolved illicit tracking investigations in which no source is located. (as required by section 4.2.3.2.6.a of the permit) Documentation for intermittent illicit discharges (as required by section 4.2.3.2.6.b of the permit).	Documentation will begin as soon as practical.	As Needed	Public Works Department

Measurable Goal:

· Document illicit tracking and elimination activities.

Field Screening Assessment	Not Started:⊠ 1	n Progress:	Completed:
	Section: 4.	2.3.2.3b	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Assess the effectiveness of the Field Screening program by the end of permit year 3.	Deadline: December 31, 2016	Once during permit term	Public Works Department

Measurable Goal:

• A summary assessing the effectiveness of the Field Screening program.

Employee Training	Not Started: 🔀 🛚 1	n Progress :[Completed:
	Section: 4.	2.3.9	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
The City of Conway will implement a training program for all appropriate municipal field staff and keep track of all training and follow up training provided to address IDDE and to the staff trained in this MCM.	Start-up deadline: January 1, 2015	Annually	Public Works Department

Measurable Goal:

 Provide IDDE training to appropriate field staff. This BMP will be implemented through training for Pollution Prevention in Section 4.2.6.5

4.2.4 Construction Site Stormwater Runoff Control (Minimum Measure #4)

4.2.4.1 Permit Requirements

The City of Conway will revise the construction program by developing and implementing BMPs in order to meet the SMS4 general permit requirements. The City will update appropriate design requirements and revise the corresponding SWP3 plan review requirements. Site inspection procedures will be updated to conform to the SMS4 permit requirements, and an enforcement response plan will be developed to determine how the City will use specific type of responses to address various types of violations. In addition, the City will develop a communication process with construction operators to educate them about areas in which improvements are needed.

Table 10: Minimum Measure #4 Permit Requirements

4.2.4.4.1 Regulatory requirement for erosion and sediment controls:

Below is a copy of the relevant sections of the existing ordinance which requires erosion and sediment controls as well as sanctions to ensure compliance.

Ordinance section requiring erosion and sediment controls can be found in The City of Conway Ordinance Sec. 3.3 Design and Engineering Standards.

Ordinance section for sanctions to ensure compliance can be found in The City of Conway Ordinance Section 6.1 Enforcement.

A copy of The City of Conway's Ordinance can be found in Appendix D.

4.2.4.4.2 Requirements for erosion and sediment controls and soil stabilization practices:

The City of Conway will provide requirements for construction site operators to implement appropriate BMP such as,

- a. Erosion and Sediment Controls, and
- b. Soil Stabilization Practices

4.2.4.4.3 Requirements for pollution prevention measures:

The City of Conway will provide requirements for the design, installation and maintenance of effective pollution prevention measures for construction site operators to:

- a. Minimize the discharge of pollutants from equipment and vehicle washing, wheel wash water and other wash waters. Wash waters must be treated in a sediment basin or alternative control that provides equivalent or better treatment prior to discharge.
- Minimize the exposure of building materials, building products, construction wastes, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, sanitary waste and other materials present on site to precipitation and to stormwater runoff that may cause adverse impacts to water quality, and,
- c. Minimize the discharge of pollutants from spills and leaks and implement chemical spill and leak prevention and response procedures.

- d. The following discharges from sites are prohibited:
- i. Wastewater from washout of concrete, unless managed by an appropriate control;
- Wastewater from washout and cleanout of stucco, paint, form release oils, curing compounds and other construction materials
- iii. Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance; and,
- iv. Soaps or solvents used in vehicle and equipment washing.

4.2.4.4.4 Requirements for Stormwater Pollution Prevention Plans (SWP3):

The City of Conway will require each operator of a construction activity to prepare and submit a Stormwater Pollution Prevention Plan (SWP3) prior to the disturbance of land for the SMS4 to review and approve. Requirements for the SWP3 are included in The City of Conway's Plan Review Checklist.

4.2.4.5 Review of SWP3:

The City of Conway's plan review procedures will at a minimum meet the following:

- a. Make clear to operators of construction activity that they are prohibited from commencing construction activity until they receive of written approval of the plans.
- b. Approve SWP3 that complies with the technical requirements of The City of Conway's plan review checklist which effectively meets the requirements of NPDES General Permit for Storm Water Discharges from Construction Activities, SCR100000.
- c. The SWP3 must include the rationale used for selecting control measures, including how the control measure protects a waterway or stormwater conveyance.
- d. The City of Conway will use qualified individuals, knowledgeable in the technical review of SWP3 to conduct reviews.
- e. Document the review of each SWP3 plan using a checklist or similar process.
- f. Procedures for SWP3 review, including the review of pre-construction site plans, for construction activity that discharge pollutant(s) of concern to TMDL waters and to waters on the 303(d) List of Impaired Waters, the SWP3 must identify potential water quality impacts the permitted discharges may have. The SWP3 shall limit sediment discharges to the MEP, shall protect water quality. Procedures for SWP3 review shall:
 - i. Incorporate consideration of potential water quality impacts,
 - ii. Include the review of construction site plans,
 - iii. For construction projects that disturb less than 25 acres, carefully evaluate all selected BMPs and their ability to control the pollutant(s) of concern.
 - iv. For construction projects that disturb 25 acres or more, require a written quantitative and

qualitative assessment showing that the selected BMP will control the discharge of the pollutant, or pollutants, of concern from construction and post construction within a TMDL watershed, or to a water on the 303(d) List of Impaired Waters, and,

v. Require that SWP3 prepared by construction activity applicants for SMS4 review and approval must demonstrate that stormwater discharges will neither cause nor contribute to a violation of water quality standards.

4.2.4.6 Site inspections:

- a. The City of Conway will maintain an inventory of all active construction projects. The inventory will be continuously updated as new projects are permitted and projects are completed. The inventory will contain relevant contact information for each project (e.g., name, address, phone, etc.), the size of the project and area of disturbance. The City of Conway will make the inventory available to SC DHEC upon request. As part of this inventory,
 - The City of Conway will track the number of inspections for the inventoried construction sites throughout the reporting period to verify that the sites are inspected at the minimum frequencies required, and,
 - ii. Document inspections and enforcement activities for each site in the inventory.
- b. The City of Conway will implement procedures for inspecting construction projects in accordance with the frequency listed in the SMS4 General Permit.
- c. The City of Conway will adequately inspect all phases of construction. At a minimum, inspections must occur following installation of initial BMPs, during active construction, and after final site stabilization.
- d. The City of Conway will have trained and qualified inspectors. The City of Conway will also continue to follow, and revise as necessary, written procedures outlining the inspection and enforcement procedures.

Inspections of construction sites must, at a minimum:

- Check for coverage under SCR100000 by requesting a copy of any application or Notice of Intent (NOI), the stamped approved stormwater pollution prevention plan or other relevant application form during initial inspections.
- ii. Review the applicable stormwater pollution prevention plan and conduct a thorough site inspection to determine if control measures have been selected, installed, implemented, and maintained according to the plan.
- iii. Assess compliance with The City of Conway's ordinances and permits related to stormwater runoff, including the implementation and maintenance of designated minimum control measures.
- iv. Assess the effectiveness of control measures.
- v. Visually observe and record non-stormwater discharges, potential illicit connections, and potential discharge of pollutants in stormwater runoff.
- vi. Provide a written or electronic inspection report generated from findings in the field.

4.2.4.7 Enforcement Response Plan (ERP):

The City of Conway will develop an Enforcement Response Plan (ERP). The ERP will contain descriptions of how The City of Conway will use specific type of responses to address various types of violations. The ERP will include, but is not limited to:

- Types of response;
 - i. Verbal warnings,
 - ii. Written notices, and
 - iii. Escalated enforcement measures such as citations, fines, stop work orders, etc.
- Specific strategies for escalating enforcement response, where necessary, to address persistent, repeat or escalating violations.
- Ensure ERP is reasonably effective in reducing pollutant discharges to the MEP and to protect water quality.

4.2.4.8 MS4 staff training:

The City of Conway will ensure that all staff, whose primary job duties are related to implementing the construction stormwater program, including permitting, plan review, construction site inspections, and enforcement, is trained to conduct these activities.

4.2.4.9 Construction site operator and public involvement:

4.2.4.9.a Construction operator education:

The City of Conway will develop and implement an effective communication process with construction contractors to educate them on areas in which improvements are needed and to enforce any required actions.

4.2.4.9.b Public involvement:

The City of Conway will consider public responses for program modifications during public education and outreach programs.

4.2.4.2 BMP Implementation

The following BMP's were developed by considering the permit requirements listed in Table 11. In order to meet the requirements of Minimum Measure #4, the City of Conway has listed BMPs that focus on the reduction of pollutants in stormwater runoff to the SMS4 from construction activities that result from a land disturbance of greater than or equal to one acre. The City of Conway will continue and improve existing BMPs that provide assistance and ensure compliance through routine inspections. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable

goals for the various BMP implementation steps or tasks. In order to meet the requirements of Minimum Measure #4, the City of Conway will:

- Update Pollution Prevention BMP Requirements
- Revise SWP3 Submittal & Review Requirements
- Develop SWP3 Review Procedures for Discharges to Impaired Waters
- Modify and Maintain a Construction Site and Site Inspection Inventory
- Develop/Modify Site Inspection Procedures
- Develop Section of ERP for Construction Activities
- MS4 Staff & Construction Operator Training/Education

Table 11 describes the components of the City of Conway's construction site stormwater runoff control program:

Table 11: Best Management Practices - Minimum Measure #4

CONSTRUC	CTION RUNOFF B	MPs		
Update Pollution Prevention	Not Started:	In Progress :	Completed:	
Requirements	Section: 4.2.4.4.1/2/3			
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Update the Stormwater Ordinance to include all requirements for Pollution Prevention Measures listed in Section 4.2.4.4.1/2/3.	Deadline: December 31, 2014	Once during permit term	Public Works Department	
Measurable Goal:		•		
Add Pollution Prevention requirements to the second s	ne Stormwater Ordinan	ice.		
Revise SWP3 Submittal & Review	Not Started:	In Progress:	Completed:	
Requirements	Section: 4.2.4.4.5.b/c			
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Update the Stormwater Ordinance and other guidance documents to include new requirements from the 2012 Construction General Permit.		Once during permit term	Public Works Department	
Update the Stormwater Ordinance and other guidance documents to ensure SWP3 submittals include a rationale used for selecting control measures, including how the control measure protects a waterway or stormwater conveyance.	Deadline: December 31, 2014	Once during permit term	Public Works Department	
Update plan review procedures to address new requirements listed above.		Once during permit term	Public Works Department	
Measurable Goal:				
 Update SWP3 submittal requirement docum items listed above. 	ents and corresponding	g plan review proc	edures to include	

Develop SWP3 Review Procedures for	Not Started:⊠	In Progress:	Completed:
Discharges to Impaired Waters	Section: 4.2.4.4.5.f		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
The City of Conway will develop procedures outlined in section 4.2.4.5.f for SWP3 review for construction activity that discharge pollutant(s) of concern to TMDL waters and to waters on the 303(d) List of Impaired Waters.	Deadline: December 31, 2015	Once during permit term	Public Works Department
Measurable Goal:			
Develop plan review procedures for construction	ction discharges to imp	paired waters.	
Modify and Maintain Construction Site	e Not Started:⊠ In Progress : C		Completed
and Site Inspection Inventory	Section: 4	.2.4.6(a)	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
The City of Conway will maintain an inventory of all active construction projects. The inventory will be edited to include information for: Relevant contact information The size of the project Area of disturbance Number of inspections by the City of Conway for each construction site Inspection results and enforcement actions.	Deadline: December 31, 2014	Inventory will be updated as needed	Public Works Department
Measurable Goal:			
 Develop and maintain a database that provi inspections are conducted by the constructi 		nation and ensures	appropriate site
Madify City Inspection Decades	Not Started:	In Progress :[Completed:
Modify Site Inspection Procedures	Section: 4	.2.4.6(b-d)	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
The City of Conway will modify site inspection procedures to be in compliance with permit section 4.2.4.6(b-d).	Deadline: December 31, 2014	Once during permit term	Public Works Department
Measurable Goal:	I.	L	
Develop a SOP for site inspection procedure	s that includes the ite	ms listed above	

ERP for Construction Activities	Not Started:	In Progress :	Completed:	
	Section: 4.2	2.4.7		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Develop enforcement responses for permit violations, SWP3 violations, and EPSC BMP installation, operation, and maintenance violations.	Deadline: December 31, 2014	Once during permit term	Public Works Department	
Measurable Goal:			L	
Develop an ERP for construction activities.	de the transfer was			
MS4 Staff & Construction Operator	Not Started:⊠	In Progress :	Completed:	
Training/Education	Section: 4.2	2.4.8		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
The City of Conway will train MS4 staff to learn to conduct permitting, plan review, construction site inspections, and enforcement. The City of Conway will develop construction operator training.	Throughout Permit Term Beginning in Year 2	Annually	Public Works Department	
Measurable Goal:				
Develop a training course for MS4 staff train	ning and construction o	perators.		
Construction Operator Education	Not Started:	In Progress :	Completed:	
Construction Operator Education	Section: 4.2.4.9.a			
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
The City of Conway will develop and implement an effective communication process with construction contractors to educate them on areas in which improvements are needed and to enforce any required actions.	Throughout Permit Term Beginning in Year 2	Annually	Public Works Department	
Measurable Goal:				
• Implement an effective communication prod	cess with construction o	contractors.		
Public Involvement	Not Started:⊠	In Progress :	Completed:	
rubiic involvement	Section: 4.2.4.9.b			
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
The City of Conway will implement procedures for receipt and consideration of information submitted by the public.	Throughout Permit Term Beginning in Year 2	Annually	Public Works Department	
Measurable Goal:	·	4	100000000000000000000000000000000000000	

4.2.5 Post-Construction Stormwater Management for New Development and Redevelopment (Minimum Measure #5)

4.2.5.1 Permit Requirements

The post-construction stormwater management program is designed to give the City of Conway the authority to require structural and non-structural stormwater quality BMPs on sites being developed. The City of Conway currently provides design requirements to control stormwater discharges from new development and redeveloped sites and has established performance standards for addressing the first inch of runoff. The City of Conway will improve the post-construction program by ensuring post-construction BMPs are inspected and maintained.

Table 12: Minimum Measure #5 Permit Requirements

4.2.5.1. Post-construction stormwater management program:

The City of Conway will provide water quality design requirements to control stormwater discharges from new development and redeveloped sites that disturb at least one acre (including projects that disturb less than one acre that are part of a larger common plan of development or sale, LCP) that discharge into an SMS4. The requirements apply to private and public development sites, including roads.

4.2.5.2 Site performance standards:

In accordance with Section 4.2.5.2 of the SMS4 general permit, The City of Conway will produce a set of site performance standards which will be applied to all new development and redevelopment sites discharging to The City of Conway's SMS4, which disturb greater than or equal to one acre. These standards will ensure that projects approximate pre-development conditions to the MEP to protect water quality.

4.2.5.3 Site plan review:

To ensure that all applicable new development and redeveloped sites conform to the performance standards required in Section 4.2.5.2, The City of Conway will implement project review, approval, and enforcement procedures.

The City of Conway will conduct site plan reviews of all new development and redeveloped sites which will disturb greater than or equal to one acre and discharge to the MS4 (including sites that disturb less than one acre that are part of a LCP). The site plan review will specifically address how the project applicant meets the performance standards and how the project will ensure long-term maintenance of post construction BMP

4.2.5.4 Long-term maintenance of post-construction stormwater control measures:

All structural stormwater control measures installed and implemented to meet the site performance standards will be maintained in perpetuity. The City of Conway will ensure the long-term maintenance of structural stormwater control measures installed.

The City of Conway will require that property owners or operators of any new development or redeveloped site subject to the site performance standards will provide verification of maintenance for the approved structural stormwater control measures used to comply with the performance standards.

4.2.5.5 Inventory of post-construction stormwater control measures:

The City of Conway will maintain an inventory of all post-construction structural stormwater control measures installed and implemented at new development and redeveloped sites, including both public and private sector sites located within the permit area. At a minimum, the inventory shall contain all BMP constructed since the effective date starting with the effective date of this permit.

4.2.5.6 Inspections and enforcement:

4.2.5.6.1 Inspection procedures:

To ensure that all stormwater control measures are operating correctly and are being maintained as required consistent with its applicable maintenance agreement, The City of Conway will conduct inspections of each project site covered under the performance standards listed in the Stormwater Design Manual, at least one time during the permit term.

4.2.5.6.2 Post-construction notification:

Within 30 days of completion of construction of any project required to meet the performance standards, The City of Conway will conduct a post construction inspection to verify that BMP have been installed as per approved plans.

4.2.5.6.3 Inspection reports:

The City of Conway will document its inspection findings in an inspection report. The City of Conway will document and maintain records of inspection findings and enforcement actions and make them available for review by the permitting authority.

4.2.5.2 BMP Implementation

The following BMP's were developed by considering the permit requirements listed in Table 13. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. In order to meet the requirements of Minimum Measure #5, the City of Conway will:

- Develop Post-Construction Stromwater Management Program
- Modify Site Performance Standards
- Conduct Site Plan Reviews
- Ensure Long-Term Maintenance of Post-Construction Stormwater Control Measures
- Develop Long Term Maintenance Requirements for Post-Construction BMPs
- Create Post-Construction BMP Inventory
- Develop Post-Construction BMP Inspection Program

Table 13 describes the components of the City of Conway's Post-Construction stormwater management program:

Table 13: Best Management Practices - Minimum Measure #5

POST-CONSTI	RUCTION RUNOFI	F BMPs	
Develop Post-Construction	Not Started:	In Progress:	Completed:
Stormwater Management Program	Section: 4.2	2.5.1	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Develop written procedures for implementing the post-construction stormwater management program.	Deadline: December 31, 2014	Once during permit term	Public Works Department
Measurable Goal:			
Update post-construction site performance	standards.		
	Not Started:	In Progress:	Completed:
Modify Site Performance Standards	Section: 4.2	2.5.2	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Develop additional site performance standards in addition to the existing "first inch" standard.	Deadline: December 31, 2014	Once during permit term	Public Works Department
Measurable Goal:			
Update post-construction site performance	standards.		
Conduct Site Plan Povious	Not Started:	In Progress:	Completed:
Conduct Site Plan Review	Section: 4.7	2.5.3	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
City of Conway will ensure that all applicable			
new development and redeveloped sites conform to the performance standards required in Section 4.2.5.2. Project review, approval, and enforcement procedures will be	Deadline: December 31, 2014	Once during permit term	Public Works Department
new development and redeveloped sites conform to the performance standards required in Section 4.2.5.2. Project review, approval, and enforcement procedures will be implemented. City of Conway will conduct site plan reviews of all new development and redeveloped sites which will disturb greater than or equal to one acre and discharge to the MS4.			,
new development and redeveloped sites conform to the performance standards required in Section 4.2.5.2. Project review, approval, and enforcement procedures will be implemented. City of Conway will conduct site plan reviews of all new development and redeveloped sites which will disturb greater than or equal to one	December 31, 2014 Throughout Permit Term Beginning in	permit term	Department Public Works

Ensure Long-Term Maintenance of	Not Started:⊠	n Progress:	Completed:
Post-Construction Stormwater Control Measures	Section: 4.2	.5.4	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Ensure the long-term maintenance of all structural control measures installed and implemented to meet the performance standards of Section 4.2.5.2.	Deadline: December 31, 2014	Once during permit term	Public Works Department
City of Conway will require that property owners or operators of any new development or redeveloped site subject to the performance standards in Section 4.2.5.2 provide verification of maintenance for the approved structural stormwater control measures used to comply with the performance standards.	Throughout Permit Term Beginning in Year 2	Annually	Public Works Department

Measurable Goal:

• Ensure that post-construction stormwater control measures are maintained.

Rest Country ties BMD Investor	Not Started: ⊠	In Progress :	Completed:
Post-Construction BMP Inventory	Section: 4.2	2.5.5	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Develop an inventory of all City permitted post- construction BMPs constructed since the effective date of permit SCR030000 (January 1, 2014).	Deadline: December 31, 2014	Once during permit term	Public Works Department
Update City permitted Post-Construction BMP Inventory.	Throughout Permit Term Beginning in Year 2	Annually	Public Works Department

Measurable Goal:

• Provide an inventory of City permitted post-construction BMPs.

Post-Construction BMP Inspections	Not Started:	In Progress :	Completed:
Program	Section: 4.2.5.4/6		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Develop procedures and forms for post- construction BMP installation inspections.	Deadline: December 31, 2014	Once during permit term	Public Works Department
Conduct post-construction BMP inspection on City permitted post-construction BMPs within 30 days of construction completion to ensure BMP is installed per approved plans.	Throughout Permit Term Beginning in Year 2	Annually	Public Works Department
Develop procedures and forms for post- construction BMP maintenance inspections.	Deadline: December 31, 2014	Once during permit term	Public Works Department
Conduct post-construction BMP inspections on City permitted post-construction BMPS to ensure BMPs are maintained properly after the City is notified through a Notice of Termination (NOT).	Throughout Permit Term Beginning in Year 2	Once during permit term	Public Works Department

Document and maintain records of inspection findings and enforcement actions and make them available for review by the permitting authority.	Throughout Permit Term Beginning in Year 2	Annually	Public Works Department
Measurable Goal:			
 Develop procedures and forms for Post-Cor this document. 	nstruction BMP installatio	n inspections and	include procedures in
Inspect all City permitted post-constructio	n BMPs within 30 days of	construction com	pletion.

- Develop procedures and forms for Post-Construction BMP maintenance inspections and include procedures in this document.
- Inspect appropriate construction sites to ensure City permitted Post-Construction BMPs are maintained and operating correctly.
- Provide documentation of Post-Construction BMP inspections.

4.2.6 Pollution Prevention / Good Housekeeping (Minimum Measure #6)

4.2.6.1 Permit Requirements

In order to meet the requirements of Minimum Measure #6, the City of Conway will implement a range of BMPs targeted to reduce pollutants from City-Owned facilities and storm sewer systems. A Citywide inventory of major municipal facilities will be developed, and each facility will be assessed for the potential pollutant discharges. Based on the assessment, a list of high priority facilities will be developed, and annual inspections will be conducted at the high priority facilities. The City of Conway will prioritize their owned and /or operated stormwater management systems and implement a maintenance schedule. All City-Owned structural controls (stormwater BMPs) will be inspected and maintained. In addition, the City will develop a set of pollution prevention measures for operation and maintenance activities. The City of Conway will provide training to appropriate employees to ensure pollution prevention and good housekeeping activities are practiced throughout the City's separate departments.

Table 14: Minimum Measure #6 Permit Requirement

4.2.6.1 Development of a municipal facility and stormwater control inventory:

The City of Conway will update and maintain an inventory of municipally-owned and stormwater controls that are not covered under a separate general or individual NPDES permit (i.e. industrial, solid waste, etc.). Examples of these types of facilities may include but are limited to composting facilities, equipment storage and maintenance facilities, landscape maintenance on municipal property, material storage yards, public buildings, golf courses, public work yards, recycling facilities, salt storage facilities, municipally owned and/or maintained structural stormwater controls.

The City of Conway will also include a list of industrial facilities owned or operated by the City that are subject to SCDHEC NPDES General Permit for Storm Water Discharges associated with Industrial Activity (SCR000000) or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to the City's SMS4. The SCDHEC permit number or a copy of the Industrial NOI form for each facility will be included.

4.2.6.2 Municipally-owned or operated facility assessment:

4.2.6.2.1 Comprehensive assessment of pollutant discharge potential:

The City of Conway will develop a comprehensive assessment of all City-owned or operated facilities identified in Part 4.2.6.1 at least once during the permit term and include it in the permit reapplication for their potential to discharge pollutants in stormwater.

4.2.6.2.2 Identification of high priority facilities:

The City of Conway will identify "high-priority" facilities that have a high potential to generate stormwater pollutants.

4.2.6.2.3 Documentation of comprehensive assessment results:

The City of Conway will document the results of the assessments and maintain copies of all site evaluation checklists used to conduct the comprehensive assessment. The documentation will include the results of The City of Conway's initial assessment, any identified deficiencies and corrective actions taken.

4.2.6.3 Annual comprehensive inspections of high priority facilities:

Starting no later than 24 months from the effective date of coverage and at least once per year thereafter, a comprehensive inspection of "high priority" facilities (Part 4.2.6.2.2), including all stormwater controls, must be performed by The City of Conway. Specific attention will be given to waste storage areas, dumpsters, vehicle and equipment maintenance/fueling areas, material handling areas, and similar potential pollutant-generating areas. The yearly inspection results will be documented and records will be maintained by The City of Conway. The inspection report will also include any identified deficiencies and the corrective actions taken to fix the deficiencies.

4.2.6.4 Storm sewer system maintenance activities - MS4 maintenance:

4.2.6.4.1 Assessment/prioritization of stormwater management systems/structures:

The City of Conway will prioritize their owned and /or operated storm water management systems / structures and implement a maintenance schedule.

4.2.6.4.2 Municipal activities and operation:

The City of Conway will develop a set of pollution prevention measures that, when applied during municipal O&M activities, will reduce the discharge of pollutants in stormwater. Municipal operation and maintenance activities to be considered include but are not limited to; pavement and rights-of-way maintenance, bridge maintenance, cold weather operations, and municipally sponsored events.

4.2.6.4.3 Maintenance of municipally-owned and/or maintained structural stormwater controls:

The City of Conway will inspect, and maintain, wherever and whenever necessary, all City owned or maintained structural stormwater controls. The City of Conway will also maintain all municipally owned green infrastructure practices through regularly scheduled maintenance activities.

4.2.6.5 Employee training and education requirements:

The City of Conway will develop an annual employee training program for appropriate employees involved in implementing pollution prevention and good housekeeping practices.

This annual training will include a general stormwater education component, any new technologies, operations, or responsibilities that arise during the year, and the Permit Requirements that apply to the staff being trained.

A description of the program will be maintained for review by the permitting authority.

The City of Conway will also identify and track all personnel requiring training and records must be maintained.

Training will begin within the first year from the effective date of permit authorization.

4.2.6.6 Requirements for contractor oversight:

Contractors hired by The City of Conway to perform municipal maintenance activities will be contractually required to comply with all of The City of Conway's stormwater control measures, good housekeeping practices, and facility-specific stormwater management procedures.

The City of Conway will provide oversight of contractor activities to ensure that contractors are using appropriate control measures and procedures.

4.2.6.2 BMP Implementation

The following BMP's were developed by considering the permit requirements listed in Table 15. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. In order to meet the requirements of Minimum Measure #6, the City of Conway will:

- Develop a Municipal Facility Inventory
- Conduct Assessment of Non-Permitted Municipal Facility & Identify High Priority Facilities
- Conduct High Priority Facility Inspections
- Prioritize stormwater management systems/structures
- Develop and Implement Pollution Prevention Measures for Operation and Maintenance Activities
- Inspect and Maintain City-Owned Structural Controls (stormwater BMPs)

- Conduct Pollution Prevention and Good House Keeping Employee Training
- Requirements for Contractors Oversight

Table 15 describes the components of the City of Conway's pollution prevention/good housekeeping for municipal operations program:

Table 15: Best Management Practices - Minimum Measure #6

POLLUTION PREVENTI	ON / GOOD HOUSE	KEEPING BMP	S	
Municipal Facility Inventory	Not Started:⊠	In Progress:	Completed:	
Section: 4.2.6.1.1				
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Develop an inventory of all City -owned facilities and stormwater controls that are not covered under a separate NPDES permit. In addition, include a list of all municipally owned facilities that are covered under a separate NPDES permit.	Deadline: December 31, 2014	Once during the permit term	Public Works Department	
Measurable Goal:				
An inventory of non-permitted municipal fac-	cilities.			
 A list of all municipally owned facilities that 	are covered under a s	eparate NPDES pe	ermit.	
Assessment of Non-Permitted	Not Started:⊠	In Progress :	Completed:	
Municipal Facilities	Section: 4.2.6.2			
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Conduct a GIS analysis based on type of facility/use, locations to waterbody, City owned BMPs to rank City facilities.	Deadline: December 31, 2014	Once during permit term	Public Works Department	
Based on the results of the GIS analysis, identify high priority facilities.	Deadline: December 31, 2014	Once during permit term	Public Works Department	
high priority facilities. Create a site evaluation checklist that will be	December 31, 2014 Deadline:	permit term Once during	Department Public Works	
high priority facilities. Create a site evaluation checklist that will be used to conduct an assessment of all facilities. Conduct facility site inspections with evaluation checklist at each facility identified in the	Deadline: December 31, 2014 December 31, 2014 Deadline:	Once during permit term Once during	Public Works Department Public Works	
high priority facilities. Create a site evaluation checklist that will be used to conduct an assessment of all facilities. Conduct facility site inspections with evaluation checklist at each facility identified in the inventory from Section 4.2.6.1.	Deadline: December 31, 2014 Deadline: December 31, 2018 Deadline: December 31, 2018	Once during permit term Once during permit term Once during permit term Once during	Public Works Department Public Works Department Public Works Department	

- Conduct inspections at municipal facilities and complete site evaluation checklist.
- · Documentation of site evaluation checklists.
- · A list of high priority facilities.

Conduct High Priority Facility Inspections	Not Started:⊠	in Progress :	Completed:
	Section: 4.2	2.6.3	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Create inspection report template with sections for identified deficiencies and corrective action taken for each site inspection.	Deadline: December 31, 2015	Once during permit term	Public Works Department
Conduct facility site inspections including evaluations of potential "pollutant generating" areas.	Throughout Permit Term Beginning in Year 3 (January 1, 2016)	Annual	Public Works Department
Document inspection reports.	Deadline: January 1, 2017	Annual	Public Works Department

Measurable Goal:

- · Create a high priority facility inspection report form.
- Conduct inspections and determine potential "pollutant generating" areas at high priority facilities.
- · Documentation of facility inspection report forms.

Prioritize MS4 Stormwater	Not Started:⊠	In Progress:	Completed:
Management Systems/Structures	Section: 4.2	2.6.4.1	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Prioritize stormwater management systems / structures.	Deadline: March 1, 2015	Once during permit term	Public Works Department
Implement a maintenance schedule for stormwater management systems/structures.	Deadline: May 1, 2015	Once during permit term	Public Works Department

Measurable Goal:

A schedule to maintain the stormwater management system.

Develop and Implement Pollution	Not Started:⊠	In Progress :	Completed:	
Prevention Measures for Operation and Maintenance Activities	Section: 4.2.6.4.2			
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Develop a written set of pollution prevention measures for municipal operation and maintenance activities.	Deadline: December 31, 2014	Once during permit term	Public Works Department	
Implement pollution prevention measures for municipal operation and maintenance activities.	Deadline: June 1, 2015	Throughout permit term	Public Works Department	
Measurable Goal:		•		
A written set of pollution prevention measure	res for operation and n	naintenance activi	ties.	
Inspect and Maintain City-Owned	Not Started:⊠	In Progress:	Completed:	
Structural Controls	Section: 4.2.6.4.3			
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party	
Create a structural control inspection and maintenance form.	Deadline: December 31, 2014	Once during permit term	Public Works Department	
Conduct inspections for City-Owned structural controls.	Deadline: April 31, 2015	Annually	Public Works Department	
Perform necessary maintenance for City-Owned structural controls.	Deadline: December 31, 2015	Annually	Public Works Department	
Measurable Goal:				
A structural control inspection and mainten	ance form.			
Conduct inspections for City-Owned structu	ral controls.			
Conduct maintenance for City-Owned struct	tural controls.		300 311 20	
Documentation of completed inspection and	d maintenance forms.			

Conduct Pollution Prevention and	Not Started:⊠	III E 1 0 E 1 2 2 2 1	Completed:
Good House Keeping Employee Training	Section: 4.2.6.5		
Wilestone(s)	Schedule/Deadline	Frequency	Responsible Party
Develop an annual employee training program for appropriate employees involved in implementing pollution prevention and good housekeeping practices. Include training for IDDE and any new technologies, operations, or responsibilities that arise during the year, and the Permit Requirements that apply to the staff being trained.	Deadline: December 31, 2014	Once during permit term	Public Works Department
Conduct pollution prevention and good house keeping training.	Start-up deadline: January 1, 2015	Annually	Public Works Department
Create a list of employees that have been identified for pollution prevention training.	Deadline: December 31, 2014	Annually	Public Works Department
A list of employees participating in the train	ning program.		
Conduct staff training.		In Progress :	Completed:
		In Progress:	Completed:
Conduct staff training. Requirements for Contractors	Not Started: ∑	In Progress:	Completed:
Conduct staff training. Requirements for Contractors Oversight	Not Started: Section: 4.2.6.6		
Conduct staff training. Requirements for Contractors Oversight Milestone(s) Revise contracts and necessary documents to contractually require contractors hired by the City of Conway to comply with all of the SMS4 stormwater control measures, good housekeeping practices, and facility-specific	Not Started: Section: 4.2.6.6 Schedule/Deadline Deadline:	Frequency Once during	Responsible Party Public Works
Conduct staff training. Requirements for Contractors Oversight Milestone(s) Revise contracts and necessary documents to contractually require contractors hired by the City of Conway to comply with all of the SMS4 stormwater control measures, good housekeeping practices, and facility-specific stormwater management procedures. The City of Conway must provide oversight of contractor activities to ensure that contractors are using appropriate control measures and	Not Started: Section: 4.2.6.6 Schedule/Deadline Deadline: December 31, 2014 Deadline:	Frequency Once during permit term	Responsible Party Public Works Department Public Works

4.5 Reviewing and Updating Stormwater Management Programs

Table 16: SWMP Requirements

SWMP	REQUIREMENTS		
	Not Started:	n Progress : 🗵	Completed:
Update Stormwater Management Plan	Section: 4.5.1 & 4.5.2		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Review and revise the SWMP document to keep it up to date during the term of the permit.	Deadline: December 31, 2018	Annually	Public Works Department
Stormwater Management Plan	Not Started:⊠ In	Progress :	Completed;
Updates Required by SCDHEC	Section: 4.5	5.3	
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
SCDHEC requested changes to the SWMP.	Deadline: December 31, 2018	As Required	Public Works Department

This SWMP is a living document and will be updated and revised throughout the permit term, as necessary. In accordance with Section 4.5.2 of the general SMS4 permit, additions (but not subtracting or replacing) components to the SWMP will be made at any time with a written notification made to SCDHEC.

Any changes intended to replace an ineffective or unfeasible BMP with an alternate BMP will be requested and submitted in written form to SCDHEC at any time. Unless denied by SCDHEC, changes proposed in accordance with the criteria below will be deemed approved and may be implemented 60 days from submittal of the request. If request is denied, SCDHEC will send the City of Conway a written response giving a reason for the decision. The modification requests must include the following:

- An analysis of why the BMP is ineffective or infeasible (including cost prohibitive),
- Expectations on the effectiveness of the replacement BMP, and
- An analysis of why the replacement BMP is expected to achieve the goals of the BMP to be replaced.

Additionally, SCDHEC may request the City of Conway to make changes to the SWMP at any time to:

- Address documented impacts on receiving water quality caused, or contributed to, by discharges from the SMS4;
- Include more stringent requirements necessary to comply with new Federal statutory or regulatory requirements; or
- Include such other conditions deemed necessary by the Department to comply with the goals and requirements of the Clean Water Act.

 Changes requested by SCDHEC must be made in writing, set forth the time schedule for the City to develop the changes, and offer the City the opportunity to propose alternative program changes to meet the objective of the requested modification. All changes required by SCDHEC will be made in accordance with South Carolina Water Pollution Control Permits Regulation 61-9 124.5, 122.62, or as appropriate 122.63.

5.3 Reporting

Table 17: Reporting

	REPORTING		
44.	Not Started:	n Progress :	Completed:
1 st Report	Section: 5.3		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Complete and Submit 1 st Report (covering years 1 and 2).	Deadline: April 01, 2016	Once	Public Works Department
	Not Started:⊠ I	n Progress :	Completed:
2 nd Report	Section: 5.3		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Complete and Submit 2 nd Report (covering years 3 and 4).	Deadline: July 4, 2018	Once	Public Works Department
	Not Started: ⊠ 1	n Progress :	Completed:
Reports During Expired Permits	Section: 5.3		
Milestone(s)	Schedule/Deadline	Frequency	Responsible Party
Complete and Submit Report if the expired permit is continued.	Every year on the anniversary date of the expired permit.	Annually	Public Works Department

^{*}The above table will be the reporting schedule unless DHEC requires more frequent reports; otherwise, the reports will be submitted based on the stated schedule.

All reports shall be sent to the address below unless the Department instructs permittees to submit via alternate mechanisms (i.e. electronic mechanisms):

SCDHEC Bureau of Water Water Pollution Compliance & Enforcement 2600 Bull Street Columbia, SC 29201-1708

All reports will include:

- The status of the City of Conway's compliance with permit conditions, an assessment of the appropriateness of the identified BMP under Part 4, progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, and the measurable goals for each of the minimum control measures;
- Results of information collected and analyzed, if any, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP;
- A summary of the stormwater activities the City of Conway plans to undertake during the next reporting cycle (including an implementation schedule);
- Proposed changes to the City's SWMP, including changes to any BMP or any identified measurable goals that apply to the program elements; and
- Notice that the City of Conway is relying on another entity to satisfy some of their permit obligations (if applicable).
- Information requested in the SMS4 general permit including, but not limited to: sections 1.4.7, 3.1.1.1, 3.2.1.1, 3.2.1.2.2, 3.3.6, 4.1.6 and in the additional conditions applicable to NPDES MS4 permits contained in Appendix B of the SMS4 general permit.

Appendix A City of Conway Stormwater Management Ordinance