

Department of Public Works



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Chokwe Antar Lumumba
Mayor of the City of Jackson

Chief of Environmental Compliance and Enforcement Division
MDEQ
Office of Pollution Control
P.O. Box 2261
Jackson, Mississippi 39225



RE: City of Jackson's 2020 MS4 Annual Report

To whom it may concern:

The City of Jackson submits with this letter the 2020 Annual Report for the City of Jackson's Municipal Separate Storm Sewer System (MS4). Permit No. MSS049786.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles Williams, Jr.".

Dr. Charles Williams, Jr., P.E.
Public Works Director
City of Jackson

Cc: L. Quinn Braboy, P.E., Senior Civil Engineer
Terry Williamson, Esq., Consent Decree Manager



2020 ANNUAL REPORT

FOR THE

CITY OF JACKSON'S



MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

PERMIT NO. MSS049786

SUBMITTED TO THE



MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY

SECTION I: Summary of ACT6 Best Management Practices, MEASURABLE GOALS AND IMPLEMENTATION SCHEDULES

The City must annually summarize the progress made in implementing the conditions of the permit and the elements of the Storm Water Management Program (SWMP). Complete the following tables for each of the six SWMP minimum measures:

The Comments column should contain details regarding the steps that have been taken to implement the BMP. For those BMPs checked as not being in compliance, the Comments column should also contain an explanation for the non-compliance and an action plan/schedule for achieving compliance.

A. Public Education:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|--|----------------|----|--|--|--|
| | | Yes | No | | | |
| Distribute Educational Brochures to Target Audiences | 1 (A) The City shall distribute storm water educational brochures to target audiences listed below. A minimum of 300 brochures shall be distributed once every two years through direct mailouts, workshop handouts, permit review meetings, event booth handouts (i.e., Earth Day, Waterfest), public meetings (i.e., ward, precinct) and/or electronic mailouts. | X | | | The City is in compliance with this BMP. Over 300 brochures were handed out this year. | Public Works Dept. (SWMP staff) |
| Distribute Educational Information Through Public Meetings | 1 (B) The City shall present storm water educational information to the community through public meetings. The City shall make a presentation to each precinct at least three times per year. | | X | The City holds Community On Patrol (COP) meetings at each police precinct once per month. A stormwater presentation will be made at least once within a 4 month period in each COP meeting area. | The City did not hold precinct meetings this year due to Covid 19. | Public Works Dept. (SWMP staff) |
| Maintain & Update Stormwater Website | 1 (C) The City shall continue to maintain and annually update its Stormwater Management Program website to provide educational resources for the public. MDEQ may, at its discretion, provide or suggest information for the website. | | X | | The website was taken down to be rebuilt. The effort is taking longer than expected. | Public Works Dept. (SWMP staff) |
| Provide Annual Training for Municipal Personnel | 1 (D) The City shall perform annual storm water training for municipal personnel involved in implementing its Storm Water Management Plan. | X | | 12/31/2020 | City of Jackson facility managers and construction supervisors received Storm Water Management Training (12/31/2020). Engineering Division personnel received certified stormwater inspection training (11/14, 18, & 19/2020). | Public Works Dept. (SWMP staff) |
| Submit Annual Report to MDEQ | 1 (E) The City shall submit an Annual Report in the approved format to MDEQ by the 28th day of each January for the previous calendar year. The report shall include the status of the City's Efforts in meeting each measurable goal of this minimum measure listed above. | | | | | |

SECTION I (Continued):

| B. Public Involvement | | | | In Compliance? | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|---|---|------------|-----------|--|--|---|---|
| Best Management Practice | Measurable Goal | Yes | No | | | | |
| <p>Maintain & Update Stormwater Website for Citizens to Report Complaints</p> | <p>2 (A) The City shall continue to maintain & update its Stormwater Management Program website to provide the public with a mechanism to report complaints relating to storm water issues. The City shall log the number of complaints received, the results of complaint investigations and the corrective actions taken.</p> | | X | In progress | <p>The City of Jackson's Stormwater Mgmt. Program Website, www.jacksonms.gov/government/publicworks/swmp, has been down since approximately October of 2020 for maintenance of the entire COJ website. The IT department has been contacted to make them aware of the need for it to give an overview of the , local and federal regulations and educational brochures. Our citizens report their complaints by entering them via the 311 City Works System and we also log our storm water complaints on our illicit Discharge Hotline Incident Tracking Sheet. The Stormwater Program has issued educational information to suspected violators & referred the incidents to the appropriate divisions within the City of Jackson to take corrective actions. In 2020 the City received a number of calls in the 311 system related to drainage and blocked culverts.</p> | <p>Public Works Dept. (SWMP staff) & Director of Communications</p> | |
| <p>Coordinate Storm Drain Marking Program</p> | <p>2 (B) The City shall coordinate a storm drain marking program to inform the public that the drainage goes to surface waters. The drain marking can be performed by the City or by volunteer groups. A minimum of 60 previously unmarked drains shall be marked per year.</p> | | X | <p>The City's goal is to place an average of 120 storm drain markings each year from 2020 to 2022.</p> | <p>The Pearl River Keepers marked 41 drains in the City of Jackson's MS4 in 2020. The City's goal is to mark an average of 120 storm drains in the years of 2021 and 2022 then resume marking 60 per year until all storm drains are marked.</p> | <p>Public Works Dept. (Solid Waste Division)</p> | |
| <p>Inspect Previously Marked Drains & Remark Missing or Illegible Markers</p> | <p>2 (C) Within the first 2 years of this permit term, the City shall inspect the approximately 2,200 drains marked in previous efforts and re-mark any that are missing markers or that have illegible markers.</p> | | X | | <p>The City of Jackson is reaching out to organizations like Downtown Jackson Partners and Pearl Riverkeepers to place markers, inspect previously marked drains and establish partnerships to help with this effort.</p> | <p>Public Works Dept. (Solid Waste Division, Infrastructure Mngt.)</p> | |
| <p>Participate in Community Related Events</p> | <p>2 (D) The City shall sponsor and/or participate in at least 17 community events related to protecting storm water within the community. These events may include Earth Day, Waterfest, Great American Clean-Up, stream clean-ups, waste collection days and precinct meetings.</p> | X | | | <p>Storm water protection information was a part of a number of the City's community events in 2020 including Roll-off Dumpster days, Food Truck Fridays, and precinct/ward meetings. The City also participated in the Pearl Riverkeepers' 2020 Pearl River Clean Sweep and provided dumpster service for the sections in Jackson.</p> | <p>Public Works Dept.</p> | |

SECTION I (Continued):

| B. Public Involvement | | | | | | |
|--|---|-----------------------|-----------|--|--|---|
| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
| | | Yes | No | | | |
| Operate & Promote ESC Via Handouts & Website | 2 (F) The City shall continue to operate and promote, via its website and handouts, the Environmental Service Center for the collection of recyclable materials to provide an alternative to them being thrown out or dumped illegally. | | | | The City's Solid Waste Division promotes via https://www.jacksonms.gov/solid-waste-division/ and brochures in regards to the collection of recyclable materials at our Environmental Service Center (ESC) as an alternative to illegal dumping. The website gives an overview of the Solid Waste Collection and Recycling Program. The ESC is open every Tuesday, Thursday and 4th Saturday of each month from 8:00am-4:00pm. The ESC has recycled 60 drums totaling 3,465 gallons of materials that might have been illegally dumped or improperly disposed of this year. | Public Works Dept. (Solid Waste Division) |
| Submit Annual Report to MDEQ | 2 (F) The City shall submit an Annual Report in the approved format to MDEQ by the 28th day of each January for the previous calendar year. The report shall include the status of the City's efforts in meeting each measurable goal of this minimum measure listed above. | | | | | |

SECTION I (Continued):

C. Illicit Discharge Detection and Elimination: DX: Disagree but comply, CX: Changed to MDEQ

| Best Management Practice | Measurable Goal | In Compliance? | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|---|---|----------------|---|--|---|
| Yes | No | | | | |
| Provide Report to MDEQ Regarding MS4 Outfalls Containing Excessive Pollutants | 3 (A) Within 120 days of permit issuance, the City shall provide MDEQ with a report, documenting its investigation of the MS4 outfalls identified as containing excessive pollutants in table 1 of the April 2009 MS4 Outfall Field Screening Evaluation Report prepared by Neel-Schaffer (Appendix H). The City's report should identify the outfall, the steps used to identify the source of the illicit discharge, the source of the illicit discharge, the date the illicit discharge was eliminated or a schedule when it will be eliminated and a description of any enforcement action taken. | X | | Neel-Schaffer's office completed the City's Storm Water Dry Weather Outfall Screening and Sampling for the 38 outfalls listed in the report. | Public Works Dept. (Water/Sewer Division & SWMIP staff) |
| Update Storm Sewer Map to Reflect Additions and/or Revisions to the System | 3 (B) Maintain the City's storm sewer system map by updating it to reflect additions and/or revisions to the system. The map shall show the information listed below, if applicable. At a minimum the map shall be reviewed and updated annually. The City shall document the results of these reviews/updates. A revised storm sewer system map must be attached to the first annual report required by Act 6 of this permit, with an updated copy submitted electronically annually thereafter. | X | | There have not been any additions or revisions to the storm sewer map because there have not been any developments completed that added to the public system in 2020. 2 systems were reviewed in Site Plan Review. | Public Works Dept. (Water/Sewer Division & SWMIP staff) |
| Show Additions and/or Revisions | 3 (B) (i) MS4 outfalls | X | | The City of Jackson has developed a Water Basin Map with our outfall locations identified. | Public Works Dept. (SWMIP staff) |
| Show Additions and/or Revisions | 3 (B) (ii) Drainage areas | X | | The City of Jackson has developed a Water Basin Map with our outfall locations identified. | Public Works Dept. (SWMIP staff) |
| Show Additions and/or Revisions | 3 (B) (iii) Location and name of receiving water bodies | X | | The City of Jackson has developed a map to identify drainage areas throughout the City. | Public Works Dept. (SWMIP staff) |
| Show Additions and/or Revisions | 3 (B) (iv) Dry weather field screening stations with an individual alphanumeric identifier. | X | | The City of Jackson has developed a map to identify the locations and names of the receiving water bodies. | Public Works Dept. (SWMIP staff) |
| Show Additions and/or Revisions | 3 (B) (v) Map scale for distance | X | | A City of Jackson Water Basin Map w/ outfall locations was developed to scale. | Public Works Dept. (SWMIP staff) |
| Show Additions and/or Revisions | 3 (B) (vi) Priority areas, such as: 3 (B) (vi) (a) Areas with older infrastructure that are more likely to have illicit connections; | X | | The City of Jackson has developed a map to identify areas with older infrastructure. | Public Works Dept. (SWMIP staff) |

SECTION I (Continued):

DX: Disagree but comply, CX: Changed to MDEQ

C. Illicit Discharge Detection and Elimination:

| Best Management Practice | Measurable Goal | In Compliance? | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|---|----------------|---|---|---|
| | | Yes | No | | |
| Show Additions and/or Revisions | 3 (B), (vi) (b) Industrial, commercial, or mixed use areas; | X | | A City of Jackson Water Basin Map w/ outfall locations was developed. | Public Works Dept. (SWNMP staff) |
| Show Additions and/or Revisions | 3 (B) (vi) (c) Areas with a history of past illicit discharges; | X | | A City of Jackson Water Basin Map w/ outfall locations was developed. | Public Works Dept. (SWNMP staff) |
| Show Additions and/or Revisions | 3 (B) (vi) (d) Areas with a history of illegal dumping; | | Partial | 2/14/2020 A City of Jackson Water Basin Map w/ outfall locations was developed. Currently updating. | Public Works Dept. (SWNMP staff) |
| Show Additions and/or Revisions | 3 (B) (vi) (e) Areas with onsite sewage disposal systems; | X | | A City of Jackson Water Basin Map w/ outfall locations was developed. | Public Works Dept. (SWNMP staff) |
| Show Additions and/or Revisions | 3 (B) (vi) (f) Areas with older sewer lines or a history of sewer overflows or cross-connections; and | X | | A City of Jackson Water Basin Map w/ outfall locations was developed. | Public Works Dept. (SWNMP staff) |
| Show Additions and/or Revisions | 3 (B) (vi) (g) Areas upstream of sensitive water bodies | X | | A City of Jackson Water Basin Map w/ outfall locations was developed. | Public Works Dept. (SWNMP staff) |
| Screen one-fifth of the 120 Mapped & Designated Outfalls Annually | 3 (C) One-fifth of the 120 mapped and designated outfalls on the storm sewer system map will be screened annually for illicit discharges and improper disposal with the watershed of Hanging Moss Creek receiving priority. At the end of the five year permit cycle all outfalls will have been screened. The 16 designated outfalls within the Hanging Moss Creek watershed will be screened annually. In addition, if the City is made aware of non-storm water discharges that occur during the permit term outside of the annually screened areas, the City must include field screening stations in those areas also. | | X | Due to limited staffing, the City will employ the services of a consultant to assist with the screening of mapped outfalls. | Public Works Dept. (SWNMP staff Infrastructure Mngt. Division, (Water/Sewer Division) |
| Inspect Illicit Discharge or Improper Disposal Within 10 Days of Discovery | 3 (D) The illicit discharge or improper disposal will be investigated within 10 days of discovery. | Partial | | Standard Operating Procedures for Illicit Discharge Detection and Elimination are in place and implemented. Detection did not include sampling or analysis. | Public Works Dept. (SWNMP staff, Infrastructure Mngt. Division, Water/Sewer Division |

SECTION I (Continued):

C. Illicit Discharge Detection and Elimination:

DX: Disagree but comply, CX: Changed to MDEQ

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|---|----------------|----|--|---|---|
| | | Yes | No | | | |
| <p>Maintain Log of Statistical Data of Illicit Discharge Inspections</p> | <p>3 (E) A log shall be maintained which, at a minimum, shall document the location of the illicit discharge or improper disposal, the date of discovery, result of routine screening or complaint investigation, any sampling data, and a date of any corrective action. A follow-up inspection shall be required once the illicit discharge has been reported and eliminated. Field inspection forms similar to that found in Appendix D shall be used to provide the information to complete the required log. A summary of the inspections and the number of illicit discharges and improper disposal sites eliminated shall be documented.</p> | | | | <p>The Solid Waste Division enforced the City's illegal dumping ordinance. The City Water/Sewer Division detects illicit discharges by sight and odor. Elimination process is lead by Water/Sewer and Solid Waste Divisions. Reports and complaints are entered into the 311 City Works System log our storm water illicit discharge detection and elimination complaints on. We have currently logged 1020 SSO complaints of which 566 were found to be SSOs. Screening and sampling were not performed.</p> | <p>Public Works Dept. (SWMP staff, Solid Waste Division & Water/Sewer Division)</p> |
| <p>Perform Dry Weather Screenings of Outfalls in Priority Areas</p> | <p>3 (F) Perform dry weather screenings of storm sewer system outfalls in priority areas that may represent more likely sources of illicit discharges (i.e., older neighborhoods with deteriorating storm drain systems or which may have a higher likelihood of cross connections with the sanitary sewer system). The inspection procedures, inspection reports, and enforcement actions shall be evaluated annually. Dry weather screening shall consist of field observations and monitoring at selected stations.</p> | | X | <p>Due to limited staffing, the City will employ the services of a consultant to assist with the screening of mapped outfalls. Middle of April 2020.</p> | <p>The city did not conduct dry weather screening in 2020. The City of Jackson has received bids for contracted sampling and analysis services in 2020 from Bonner Analytical and Waypoint Analytical. The services will begin after an agreement is executed. This is expected to happen by the middle of April 2020.</p> | <p>Public Works Dept. (Water/Sewer Division)</p> |
| <p>Determine if Discharges are Illicit through Water Quality Sampling</p> | <p>3 (G) Monitoring requirements – If the discharge cannot be identified and no likely source is determined then water quality sampling can be used to determine whether the flow is likely to have resulted from an illicit discharge. At a minimum, the City is required to conduct an analysis for ammonia and detergent-surfactants. These are the best parameters to detect sewage which in the City of Jackson is documented to be the most numerous illicit discharges.</p> | | X | <p>End of March 2020.</p> | <p>The city did not conduct dry weather screening in 2020. The City of Jackson has received bids for contracted sampling and analysis services in 2020 from Bonner Analytical and Waypoint Analytical. The services will begin after an agreement is executed.</p> | <p>Public Works Dept. (SWMP staff, Water/Sewer Division)</p> |

SECTION I (Continued):

DX: Disagree but comply, CX: Changed to MDEQ

C. Illicit Discharge Detection and Elimination:

| Best Management Practice | Measurable Goal | In Compliance? | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|--|----------------|---|--|---|
| Develop Benchmark Concentration Levels for Analytical Monitoring | 3 (H) Develop benchmark concentration levels for analytical monitoring results whereby exceedance of the benchmark will require follow-up investigations to be conducted to identify and eliminate the source causing the exceedance of the benchmark. | Partial | | Standard Operating Procedures are in place and implemented. Due to working within available resources analysis were not performed. However, when we identify an issue based on odor, color, suds, typical wastewater material, etc. we investigate and eliminate the source. Benchmark concentration levels are outlined in the outfall sampling report issued by Neel-Schaffer. | Public Works Dept. (SWMIP staff, Solid Waste Division & Water/Sewer Division) |
| Train New Inspectors, Provide Refresher Trainings, Maintain Log of Trainings | 3 (I) Train new City inspectors upon initial hiring or assignment (i.e. before conducting inspections) and provide refresher training to all inspectors every five years to ensure they are knowledgeable on how to identify illicit discharges. A training log of what was taught and who attended shall be maintained by the City. | X | | Personnel from the City of Jackson's Engineering Division of the Public Works Department attended Chemical Response Training by Sigma Consulting and Training, Inc. on November 14, 2020 and Certified Stormwater Inspector Training with the MDEQ by The National Stormwater Center on November 18 and 19, 2020. | |
| Continue Countywide Emergency Response Program | 3 (J) Continue to implement the countywide emergency spill response program that addresses spills and leaks. This program is coordinated through City fire, police, the County Sheriff and the Mississippi Emergency Management Agency and MDEQ. Response to emergency spills and leaks shall be immediate. A copy of this program must be included in the SWMP. | X | | The countywide program is in place. The program is coordinated through City Police & Fire Dept. along with Emergency Mngt, Agency & Hinds County Sheriff Dept. | Fire Department, Police Department |
| Maintain & Operate Environmental Service Center | 3 (K) Continue to maintain and operate the City of Jackson's Environmental Service Center to provide a means for the public to properly dispose of oil, antifreeze, pesticides, herbicides, paints, solvents, and other potentially harmful chemicals. | X | | The City received recyclables from 1,557 people at The Environmental Service Center (ESC) on Terry Rd. The ESC has recycled 60 drums totaling 3,465 gallons of materials that could have been potentially illegally dumped or improperly disposed of this year. The ESC is advertised and utilized on Tuesday, Thursday, and the 4th Saturdays of each month from 8:00am-4:00pm. | Public Works Dept. (Solid Waste Division) |
| Provide Trash Collection Services | 3 (L) Collect containerized trash and debris at least weekly. | X | | Garbage is collected on a routine basis by Waste Management and activities are managed by the Solid Waste Division. The Solid Waste Division reported collecting 9,78 tons from roll off, 36,168.46 tons of residential garbage & 499.78 tons of recyclables. | Public Works Dept. (Solid Waste Division) |

SECTION I (Continued):

C. Illicit Discharge Detection and Elimination:

DX: Disagree but comply, CX: Changed to MDEQ

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|---|--|----------------|----|--|---|--|
| | | Yes | No | | | |
| Implement & Collect Receiptables During Public Events | 3 (M) Provide, collect, and maintain litter receptacles in strategic public areas, and during major public events. | | | | The City has a weekly meeting to review special events to make sure that clean up happens during and after events. Clean up after parades and major events is done by Parks and Rec with dumpster service by Solid Waste. Trash receptacles are strategically placed at City parks and downtown. Waste Management provides disposable receptacles for special events. | Public Works Dept. (Solid Waste Division) |
| Implement Solid Waste Management Program | 3 (N) Implement the comprehensive solid waste management program, which involves, reducing, recycling, and composting municipal solid waste. The City shall document the waste reduction achieved each year. | X | | | Solid Waste Division's Waste Reduction Report shows the waste tonnage has been reduced by 499,78 tons processed in the City's recycling program. | Public Works Dept. (Solid Waste Division) |
| Updated Inventory of All Industrial Stormwater Facilities | NPDES Storm Water Permitted Industrial Facilities 3 (N) (A) Maintain the inventory of all industrial storm water facilities that are connected to the City of Jackson's storm sewer system. For the purpose of this permit, industrial storm water facilities are those regulated under MDEQ's Baseline, Mining, Hot Mix Asphalt, Ready-Mix Concrete Storm Water General Permits. The City shall review and update the list on an annual basis. The results of the annual review shall be documented. | Partial | | | A list and map of all industrial facilities connected to the City's storm sewer system has been developed. New permits have been listed, but they did not involve new developments for mapping. | Public Works Dept. (SW/MP staff) |
| Maintain List of potential Industrial Spill Locations | 3 (N) (B) Maintain a list of potential industrial spill locations. A GIS database with locations of facilities, subject to the reporting requirements of Section 313 of SARA Title III, shall be maintained so that when the field screening takes place, cross correlation is possible with any chemicals detected. At a minimum the database shall be reviewed and updated annually. | X | | | A list of industrial facilities and 313 chemical facilities in the City of Jackson was identified. A GIS map was also developed. | Public Works Dept. (SW/MP staff) |
| Maintain Inventory of Industrial Facilities Using Industrial Facility Inspection Form | 3 (N) (C) Inspect, at a minimum, 1/5 of industrial storm water facilities identified in (B) each year. The purpose of the inspection is to identify existing or potential illicit discharges or other prohibited practices found in the City's Stormwater Ordinance. Any enforcement response shall be according to the City's ERP. The results of the inspections shall be documented in the Industrial Facility Inspection Report Form contained in Appendix F. | | X | | The City amended the list of facilities in 2020. The City is training building inspection personnel to perform construction site inspections so engineering personnel have more time to inspect industrial facilities and potential polluters. | Public Works Dept. (SW/MP staff) |

SECTION I (Continued):

C. Illicit Discharge Detection and Elimination:

DX: Disagree but comply, CX: Changed to MDEQ

| Best Management Practice | Measurable Goal | In Compliance? | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|--|---|---|--|--|
| Create Priority List for Industrial Facilities | 3 (N) (D) Include in the Fourth Annual Report a prioritized list of facilities that have a high, medium, or low potential to pollute storm water runoff. This priority list will be based on facility inspections by the City and documented in the Industrial Facility Inspection Reports. This list will aid in the prioritization of inspections in the next permit cycle. For example, the industrial facilities in the high priority category will have a more frequent inspection requirement. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | | Facilities have been listed, but were not inspected and, therefore, not prioritized during 2020. The City is training building inspection personnel to perform construction site inspections so engineering personnel have more time to inspect and prioritize industrial facilities. SOPs are in place for Illicit Discharge Detection and Elimination. | Public Works Dept. (SWAIP staff, Water/Sewer Division) |
| Maintain Inventory of Industrial Facilities Using Industrial Facility Inspection Form | 3 (N) (E) The City shall use information documented in the Industrial Facility Inspection Report form found in Appendix F to maintain the inventory of industrial facilities, the list of potential spill locations, documentation of facility inspections, and the prioritization of potential polluters. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | | Facilities have been listed, but were not inspected and, therefore, not prioritized during 2020. The City is training building inspection personnel to perform routine construction site inspections so engineering personnel have more time to inspect and prioritize industrial facilities. SOPs are in place for Illicit Discharge Detection and Elimination. | Public Works Dept. (SWAIP staff) |
| Submit Annual Report to MDEQ | 3 (N) (F) The City shall submit an Annual Report in the approved format to MDEQ by the 28 th day of each January for the previous calendar year. This report shall include the status of the | | | | |
| Provide the following information for illicit discharges detected within your MS4 during the reporting period for this Annual Report. | | | | | |
| Number of Illicit Discharges Detected: <u>566</u> | | | | | |
| Number of Illicit Discharges Eliminated: <u>335</u> SSOs <u>44</u> There are 134 pending, 44 canceled, and 52 open cases. The unresolved complaints involve repeated calls that had no observable problems upon arrival or has a temporary repair. | | | | | |

SECTION I (Continued):

D. Construction Site Storm Water Runoff Control:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--------------------------|---|----------------|----|---|--|--|
| | | Yes | No | | | |
| | 4 (A) The following discharges shall be prohibited: | X | | | | |
| | 4 (A) (i) Wastewater from washout of concrete unless managed by appropriate controls. | X | | | The City of Jackson has a Stormwater Ordinance in place and we inspect each site to make sure controls are implemented to reduce pollutants. | Public Works Dept. |
| | 4 (A) (ii) Discharges from dewatering of trenches and excavations unless managed by appropriate controls. | X | | | The City of Jackson has a Stormwater Ordinance in place and we inspect each site to make sure controls are implemented to reduce pollutants. | Public Works Dept. |
| | 4 (A) (iii) Wastewater from washout and cleanout of slurry, paint, form release oils, curing compounds and other construction materials | X | | | The City of Jackson has a Stormwater Ordinance in place and we inspect each site to make sure controls are implemented to reduce pollutants. | Public Works Dept. |
| | 4 (A) (iv) Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance | X | | | The City of Jackson has a Stormwater Ordinance in place and we inspect each site to make sure controls are implemented to reduce pollutants. | Public Works Dept. |
| | 4 (A) (v) Soaps or solvents used in vehicle and equipment washing | X | | | The City of Jackson has a Stormwater Ordinance in place and we inspect each site to make sure controls are implemented to reduce pollutants. | Public Works Dept. |
| | 4 (A) (vi) Wastewater from sanitary facilities, including portable toilets | X | | | The City of Jackson has a Stormwater Ordinance in place and we inspect each site to make sure controls are implemented to reduce pollutants. | Public Works Dept. |

SECTION I (Continued):

D. Construction Site Storm Water Runoff Control:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|---|----------------|---------|---|---|--|
| | | Yes | No | | | |
| Site Plan Review | 4 (B) The City of Jackson shall require each owner or contractor disturbing one acre of land by clearing, grading or excavating (or other land disturbing activities) to submit a site specific storm water management plan for review and approval prior to the issuance of a building permit. The acreage threshold may be less if the activity involves a "larger common plan of development or sale" (see Definitions), where the total acreage is based on a cumulative planned disturbance greater than one (1) acre. The City must document the number of site plans reviewed and indicate which are active at any specific time. The plans shall address the following minimum components that must be in accordance with the design standards set forth in the most current edition of "Erosion Control, sediment Control and Stormwater Management on Construction sites and Urban Areas (Three Volumes). | X | | | The City requires contractors for construction disturbing 1 acre or more to submit a SWPPP, a copy of their SCNOI or NOI (for 5 acres or more), and written approval from the MDEQ. The Site Plan Review Committee has reviewed a total of 54 projects. The Building Permits Division of the Department of Planning and Development tracks the status of construction sites in their permitting database. | Public Works Dept. & Planning Dept. |
| Implement Vegetative Practices to Disturbed Land | 4 (B) (i) Vegetative practices shall be designed to preserve existing vegetation where possible and re-vegetate disturbed areas as soon as practicable after grading or construction. Such practices may include, but are not limited to, surface roughening, temporary seeding, permanent seeding, mulching, sod stabilization, vegetative buffer strips, and protection of trees. When a disturbed area will be left undisturbed for 14 days or more, the appropriate temporary or permanent vegetative practices shall be implemented within 7 calendar days. | | Partial | | During inspections, we review SWPPPs, inspect sites to make sure that all disturbed slopes are stabilized, sediment barriers are adequately installed, discharge points are free of sediment, and provided educational information to tradesmen on site to make sure they are aware of the appropriate vegetative practices needed for their site. Documentation has been maintained digitally and must be transposed to the official forms. | Public Works Dept. & Planning Dept. |
| Implement Structural Practices to Divert Flows | 4 (B) (ii) Structural practices shall divert flows from exposed soils, store flows or otherwise limit runoff from exposed areas. Such practices may include, but are not limited to, construction entrance/exit, straw bale dikes, silt fences, earth dikes, brush barriers, drainage swales, check dams, subsurface drains, pipe slope drains, level spreaders, drain inlet protection, outlet protection, detention/retention basins, sediment traps, temporary sediment basins or equivalent sediment controls. | | X | | During inspections, we review SWPPPs and inspect sites to make sure that all appropriate best management practices are in place such as inlet protection, blanket protection for stock piles, dumpsters are covered, check dams, construction entrances, secondary containment, silt fencing, washout signage, and several of the items listed under our measurable goals. Per a training update straw bales are no longer recognized as a BMP. Straw wattles are used instead. | Public Works Dept. |

SECTION I (Continued):

D. Construction Site Storm Water Runoff Control:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|---|----------------|----|---|--|--|
| | | Yes | No | | | |
| Implement Sediment Basins to Disturbed Areas of 10 Acres or More | 4 (B) (iii) For drainage location (a drainage point at boundary of land disturbing activity) that serve an area with ten (10) or more disturbed acres at one time, a temporary (or permanent) sediment basin providing at least 3600 cubic feet (133 cubic yards) of storage per acre drained shall be provided until final stabilization of the site. Sediment basins must be installed before major site grading and utilize outlet structures that withdraw water from the surface and that are designed for a minimum 2-year, 24 hour storm event. If flocculants are being introduced, sediment basins must be downstream of the point of introduction and include baffles to increase sediment removal efficiency and turbidity reduction. | X | | | Addressing questions and concerns regarding erosion & sediment control plans are discussed during Site Plan Review meetings and comments are provided to contractors and developers regarding any concerns related to the plans that are submitted. No 10 or more acre developments were reviewed in 2020. | Public Works Dept. (Engineering Division) |
| Implement Post Construction Control Measures | 4 (B) (iv) A description of post-construction control measures for projects that disturb one (1) or more acres. Post-construction control measures should be installed to control pollutants in storm water after construction is complete. These controls include, but are not limited to, one or more of the following: on-site infiltration of runoff, flow attenuation using open vegetated swales, ex-filtration trenches and natural depressions, constructed wetlands and retention/detention structures. Where needed, velocity dissipation devices shall be placed at detention or retention pond outfalls and along the outfall channel to provide for a non-erosive flow. | X | | | During post construction inspections, we review plans and inspect sites to make sure that all appropriate best management practices are removed and permanent practices are in place to control runoff and maintain stormwater quality. | Public Works Dept. |
| Develop & Maintain List of Practices Appropriate to Prevent Pollutants from Entering Storm Water | 4 (B) (v) A description and list of practices appropriate to prevent pollutants from entering storm water from construction sites because of poor housekeeping. Areas shall be designated for equipment maintenance and repair; concrete chute wash off; provide waste receptacles at convenient locations and provide regular collection of waste; provide protected storage areas for chemicals, paints, solvents, fertilizers, and other potentially toxic materials; and provide adequately maintained sanitary facilities. | X | | | During inspections, we review SWPPPs, inspect sites to make sure that all disturbed slopes are stabilized, sediment barriers are adequately installed, discharge points are free of sediment, and provided educational information to tradesmen on site to make sure they are aware of the appropriate vegetative practices needed for their site. | Public Works Dept. & Planning Dept. |

SECTION I (Continued):

D. Construction Site Storm Water Runoff Control:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|---|---|----------------|----|---|--|--|
| | | Yes | No | | | |
| SWPPPs Shall Contain Scaled Site Map | 4 (B) (vi) A scaled site map shall be prepared showing boundaries of property and proposed construction activity, original and proposed contours (if practicable), drainage patterns, adjacent receiving water bodies, north arrow, all erosion and sediment controls (vegetative and structural), any post-construction control measures, and location of housekeeping practices. If the construction project is a linear construction project (e.g., pipeline, highway, etc.), a scaled site map is not required, however standard diagrams (e.g., cross sections showing dimensions and labeled components) of erosion and sediment controls to be used must be submitted. | X | | | During the Site Plan review process site drawings & maps are reviewed & scrutinized amongst multiple divisions within the City of Jackson. During inspections, we review SWPPPs and inspect sites to make sure that all appropriate best management practices are in place such as inlet protection, blanket protection for stock piles, dumpsters are covered, check dams, construction entrances, second containment, silt fencing, washout signage, and several of the items listed under our measurable goal. | Public Works Dept. |
| Ensure MDEQ Approvals/ Permits are Issued Prior to Approval of SWMP for the City. | 4 (C) The City shall require proof of issuance of applicable MDEQ approvals/permits prior to City approval of the Stormwater Management Plan. Examples of the MDEQ approval/permit coverage are as follows: | X | | | The City requires contractors for construction disturbing 1 acre or more to submit a SWPPP, a copy of their SCNOI or NOI (for 5 acres or more), and written approval from the MDEQ. | Public Works Dept. (Engineering Division) |
| Require Proof of Issuance from MDEQ | 4 (C) (i) Small construction General Permit: Coverage for land disturbances of one (1) acre to less than five (5) acres. Coverage is required for disturbances less than one acre if part of a larger common plan of development or sale. | X | | | The City requires contractors for construction disturbing 1 acre or more to submit a SWPPP, a copy of their SCNOI, and written approval from the MDEQ. | Public Works Dept. |
| Require Proof of Issuance from MDEQ | 4 (C) (ii) Large Construction General Permit: Coverage for land disturbances of five (5) acres and greater. Coverage is required for disturbances less than five acres if part of a larger common plan of development or sale. | X | | | The City requires contractors for construction disturbing 5 acres or more to submit a SWPPP, a copy of their NOI, and written approval from the MDEQ. | Public Works Dept. (Engineering, Water/Sewer Division) |

SECTION I (Continued):

D. Construction Site Storm Water Runoff Control:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|---|----------------|----|---|---|--|
| | | Yes | No | | | |
| Require Proof of Issuance from MDEQ | 4 (C) (iii) Registration Form for Residential Lot Coverage and Large Construction General Permit coverage number for residential lots in subdivision covered under a Large Construction General Permit | X | | | Questions and concerns regarding erosion & sediment control plans are discussed during Site Plan Review meetings and comments are provided to contractors and developers regarding any concerns of plans that were submitted. We have reviewed one SWPPP for multiple lots being developed at a time. | Public Works Dept. |
| Require Proof of Issuance from U.S. Army Corps of Engineers | 4 (D) The City shall require proof of issuance of applicable U.S. Army Corps of Engineers approval or permits prior to City approval if waters of the United States are being filled, rerouted or dammed. | X | | | Addressing questions and concerns regarding erosion & sediment control plans were discussed during Site Plan Review meetings and comments were provided to contractors and developers regarding any concerns of plans that were submitted. No waters of the United States were filled, rerouted or dammed. | Public Works Dept. (Engineering, Division) |
| Inspect all Construction Sites with a Disturbed Area of 2,000 Sq. Ft. or Greater | 4 (E) The City shall inspect all construction sites with a disturbed area of 2,000 square feet and greater in order to enforce the proper implementation of the stormwater management plan. At a minimum, the inspections shall take place prior to land disturbance (ensure all necessary erosion and sediment controls are in place), during site grading and all building code inspections (footing of foundation, framing and final). At the conclusion of the project, the City must inspect all projects to ensure that all graded areas have reached final stabilization and that all temporary control measures are removed. Additional inspections for sites 5 acres and greater and for sites on one acre and greater that are adjacent to perennial water bodies shall be required after a 2 year 24-hour storm event. | Partial | | | The City does not issue permits for clearing or construction for sites disturbing 2,000 or more square feet until the site passes a preconstruction erosion and sediment control inspection. Within its resources The City inspected 4 five or more acre sites in 2020 and 0 one or more acre waterside sites. However, not after every 2 year 24-hour storm event. The City is training building inspection personnel to perform construction site inspections. This will facilitate full compliance with this measurable goal. The size of the sites must be verified. | Public Works Dept. (SWMP staff) |

SECTION I (Continued):

D. Construction Site Storm Water Runoff Control:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|---|----------------|----|--|--|--|
| | | Yes | No | | | |
| Document Inspections on Construction Site Inspection Form & Distribute to Construction Site Inspectors | 4 (F) The City shall use the Stormwater Construction Site Inspection Report Form found in Appendix E and distribute it to City construction site inspectors. This form shall be completed by the City for each site inspection in order to document the number of construction site inspections performed and number and description of enforcement cases handled. Inspection findings must be documented and maintained for review by MDEQ. In addition, the City must revise as necessary the written procedures outlining the inspection procedures. | | X | The forms are being used to document digitally captured information. 2020 inspections will be documented with the forms. | The City has directed the use of the Stormwater Construction Site Inspection Report Form. Training and quality assurance is ongoing as much as possible within the City's resources so the forms are completed systematically and consistently. 1 Stop Work Order was issued not including warnings with which developers complied. | Public Works Dept. (SWAMP staff) |
| Inspect Erosion & Sediment Controls | 4 (F) (I) Ensure all necessary erosion and sediment controls have been selected, installed, implemented, and maintained according to the storm water management plan and according to design standards set forth in the most current edition of "Erosion Control, Sediment Control and Stormwater Management on Construction sites and Urban Areas (Three Volumes). | X | | | Design and performance standards for construction BMPs are followed in MDEQ's Mississippi Planning & Design Manual for the Control of Erosion, Sediment & Stormwater. During inspections, we inspect sites to make sure that they are in compliance. | Public Works Dept. (SWAMP staff) |
| Complete Follow Up Inspections | 4 (F) (II) Ensure all the inspections have been conducted with the specified frequencies. | | | The forms are being used to document digitally captured information. 2020 inspections will be documented with the forms. | During the time each construction site is inspected, we inspect to make sure that the superintendent or project manager is completing their specified weekly inspections for their site. | Public Works Dept. (SWAMP staff) |
| Inspect for Final Stabilization | 4 (F) (III) Ensure the site has reached final stabilization and that all temporary control measures are removed. | X | | | During post construction inspections, we inspect to make sure that all temporary controls have been removed and permanent ground cover is in place. | Public Works Dept. (SWAMP staff) |
| Ensure Compliance of Sites with SWAMP & Ordinances | 4 (F) (IV) Assess compliance with the stormwater management plan and applicable ordinances. | X | | | A list of acceptable structural stormwater controls was developed and inspections of these structural controls are conducted during site visits. | Public Works Dept. (SWAMP staff) |
| Inspect Control Measures | 4 (F) (V) Assess the appropriateness of planned control measures and their effectiveness. | X | | | A list of acceptable structural stormwater controls was developed and inspections of these structural controls are conducted during site visits. | Public Works Dept. (SWAMP staff) |

SECTION 1 (Continued):

D. Construction Site Storm Water Runoff Control:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|---|----------------|----|---|--|--|
| | | Yes | No | | | |
| Observe & Record Non-Stormwater Discharges | 4 (F) (vi) Visually observe and record non-stormwater discharges, potential illicit connections, and potential discharge of pollutants in stormwater runoff. | X | | | An inventory of structural stormwater controls was developed and inspections of these structural controls are conducted during site visits. | Public Works Dept. (SWMIP staff) |
| Provide Education on Stormwater | 4 (F) (vii) Provide education and outreach on stormwater pollution prevention, as needed. | X | | | Owner, representative, and contractor are provided with educational brochures at the time they pick up their site plan review application, and we remind them in the site plan review committee meeting. Also, we issue brochures when we are completing onsite inspections. | Public Works Dept. (SWMIP staff) |
| Enforce Stormwater Ordinances | 4 (F) (viii) Procedures outlining the steps, including enforcement measures that will be followed in addressing deficiencies with construction site BMPs and/or their implementation (i.e., re-inspection, enforcement). The procedures must include a mechanism to elevate enforcement of problem sites to MDEQ. These procedures must significantly adhere to the City's enforcement response plan (ERP) found at the end of the Procedures Section (ACT7). | X | | | Addressing questions and concerns regarding erosion & sediment control plans were discussed during Site Plan Review meetings and comments were provided to contractors and developers regarding any concerns of plans that were submitted. | Public Works Dept. (Engineering, Water/Sewer Division) |

SECTION I (Continued):

D. Construction Site Storm Water Runoff Control:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|---|----------------|----|---|--|--|
| | | Yes | No | | | |
| <p>Conduct Training Measures for City Personnel</p> | <p>4 (G) Conduct appropriate education and training measures for city personnel that review storm water management plans and inspect construction sites. Personnel training conducted to meet the requirements of this ACT shall be documented. Training records shall include employee's name and/or worker identification number, date of training, contents of training, an indication whether it was initial or refresher training and the employee's signature acknowledging that training was received. The City shall document details regarding construction inspector training.</p> | | | | <p>Personnel from the City of Jackson's Engineering Division of the Public Works Department attended Chemical Response Training by Sigma Consulting and Training, Inc. on November 14, 2020 and Certified Stormwater Inspector Training with the MDEQ by The National Stormwater Center on November 18 and 19, 2020.</p> | <p>Public Works Dept. (SWMP staff)</p> |
| | <p>All employees responsible for implementing and/or complying with the requirements of the storm water management plan and the City of Jackson storm water ordinances permit shall receive refresher training at least every five years. Refresher training, at a minimum, shall include a discussion of preferred controls, regulation changes and any policy, permit or procedure updates. In Addition, significant changes that effect the implementation of the SWMP shall be communicated to inspectors immediately.</p> | | | | <p>Supervisory personnel with construction and facilities management responsibilities were trained how to protect stormwater on December 31, 2020.</p> | |
| <p>Conduct Education & Training for Contractors and/or Require Verification that They Have Received Proper Training</p> | <p>4 (H) The City shall conduct appropriate education and training for contractors and/or require verification that contractors have received training in the proper installation of erosion and sediment controls and know the requirements of the City of Jackson ordinance and the submitted storm water management plan before building permits can be issued. The City must document the number of training classes provided to contractors and developers. For those contractors that do not go through a City training program, the City shall document names of said contractor, the type of training received and the mechanism used to verify training.</p> | X | | | <p>Personnel from the City of Jackson's Engineering Division of the Public Works Department attended Storm Water Management Training offered by MDOT on June 21, 2018. Contractors, designers, and developers were invited to a 2 hour training held by the City on December 19, 2020. There were 9 attendees. Instructions are given as part of the site plan review process. Permits are not issued until the site passes a preconstruction erosion and sediment control inspection.</p> | <p>Public Works Dept.</p> |

SECTION I (Continued):

D. Construction Site Storm Water Runoff Control:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|--|----------------|----|---|---|--|
| | | Yes | No | | | |
| Enforce Ordinances Requiring Submission of SWMIP | 4 (I) The City shall enforce the ordinances requiring the submittal of a storm water management plan for construction sites and for the control of erosion on privately owned vacant property. | X | | | The City has implemented a STOP WORK ORDER for the SWMIP. Stormwater staff completes site inspections. The City communicated with owners and developers by phone, email, & letters until BMPs on the site are properly installed or corrected. If the owners or developers do not comply a stop work order is issued. | Public Works Dept. |
| Conduct Annual Review of Ordinances for Construction Site Activities | 4 (J) The City shall conduct an annual review of ordinances that address construction activities for needed updates and revisions and shall submit for adoption within one (1) year of permit issuance. Amendments shall be submitted to MDEQ for review 30 days before proposed adoption. | X | | | Updates for the City's ordinance were submitted to MDEQ for review on December 11, 2020. | Public Works Dept. (SWMIP staff) |
| Update Stormwater Quality Protection Ordinance | 4 (J) (I) The City shall update the Stormwater Quality Protection Ordinance (Sec. 122-305(G)) to reflect that coverage under the State construction storm water general permit is required for sites of one acre or more, rather than five acres. | X | | | The City submitted to the MDEQ an update of its ordinance that requires coverage under the State construction storm water general permit for sites of 1 acre or more. The process to make the update effective will begin after the update is reviewed and approved in writing by the MDEQ. | Public Works Dept. |

SECTION I (Continued):

D. Construction Site Storm Water Runoff Control:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|---|----------------|----|---|---|--|
| | | Yes | No | | | |
| Update Stormwater Quality Protection Ordinance | 4 (J) (ii) The City shall update the Stormwater Quality Protection Ordinance (Sec. 122-305 (g)) to reflect that erosion and sediment control plan shall be required prior to any grading or other earthwork which affects an area larger than 2,000 square feet. The parenthetical "but less than 5 acres" must be deleted. | X | | | The City submitted to the MDEQ an update of its Stormwater Quality Protection Ordinance (Sec. 122-305 (g)) that requires an erosion and sediment control plan prior to any clearing or other earthwork which affects an area larger than 2,000 square feet and has deleted The parenthetical "but less than 5 acres". The process to make the update effective will begin after the update is reviewed and approved in writing by the MDEQ. | Public Works Dept. |
| Submit Annual Report to MDEQ | 4 (K) The City shall submit an Annual Report in the approved format to MDEQ by the 28 th day of each January for the previous calendar year. The report shall include the status of the City's efforts in meeting each measurable goal of this minimum measure listed above. | | | | | |

Provide the following information for construction projects permitted within your MS4 during the reporting period for this Annual Report.

| Project Category | Number of Projects | Number and Type of Inspections | Number and Type of Enforcement Actions Taken |
|--------------------------------|-----------------------|---------------------------------------|--|
| Small Construction (1-5 Acres) | 4 (amendment pending) | 4 Preconstruction (amendment pending) | 0 (amendment pending) |
| Large Construction (> 5 Acres) | 2 (amendment pending) | 2 Preconstruction (amendment pending) | 1 (amendment pending) |

SECTION I (Continued):

| E. Post-Construction Storm Water Management in New Development and Redevelopment: | | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|---|---|---|--|--|--|---|
| Best Management Practice | Measurable Goal | Yes | No | | | |
| | | <p>Ensure Post-Construction Run Off Rates Do Not Exceed Pre-Construction Run Off Rates</p> | <p>5 (A) Storm water Ordinances shall be the regulatory mechanism to address post construction runoff from new development and redevelopment.</p> <p>At a minimum the City shall require drainage calculation to be submitted to them for new development that analyses storm water runoff before and after the proposed development. The stormwater rates from the completed construction improvements shall not exceed the pre-construction runoff rates plus one cubic foot per second (cfs). However, if post-construction improvements shall not exceed the pre-construction runoff rates, sufficient detention storage shall be provided to limit project area runoff to pre-construction runoff rates.</p> <p>At a minimum, storm water management plan measures shall be designed to control runoff for a 100-year, 24 hour storm occurrence, including all on-site and off-site runoff contributions. During the next annual review the City shall consider requiring storm water management plans to be designed to control runoff for the 2-year, 5-year, 10-year, 25-year, and 50-year and 24-hour storm events.</p> | X | | |
| <p>Review & Update Annually Post Construction Run Off Ordinances</p> | <p>5 (B) Conduct annual reviews of ordinances that address post-construction runoff from new development and redevelopment projects. The ordinances shall not limit the post-construction minimum measure to a single type of best management practice. Draft ordinances or amendments shall be submitted to MDEQ for review 30 days before proposed adoption. The results of the annual reviews, a list of any deficiencies and a corrective action plan/schedule shall be documented.</p> | X | | | <p>The City of Jackson's Stormwater Quality Protection ordinance is in place. Presently, a draft of updates for the City's ordinance were submitted to MDEQ for review on December 11, 2020. The process to make the update effective will begin after the update is reviewed and approved in writing by the MDEQ.</p> | <p>Public Works Dept. (Engineering Division)</p> |
| <p>Verify Maintenance Agreements</p> | <p>5 (C) Ensure adequate long-term operation and maintenance of BMPs. The City of Jackson shall require a maintenance agreement and provide verification of maintenance provisions for post-construction management practices. These agreements shall allow the City to conduct inspections of the management practices and also account for transfer of responsibility in leases and/or deed transfers. Verification shall include one or more of the following as applicable:</p> | X | | | <p>We have developed a prioritized list of post construction structural controls. We inspect the structural controls as outlined in our permit. The City Engineering Division requires our stakeholders to provide Drainage calculation in the site plan review meeting. The City's ordinance authorizes designated personnel to enter upon and inspect real property, structures, and buildings as necessary to assess compliance with the permit issued by the MDEQ.</p> | <p>Public Works Dept. (Infrastructure Mngt. & Engineering Division)</p> |

SECTION I (Continued):

E. Post-Construction Storm Water Management in New Development and Redevelopment:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|--|----------------|----|---|---|---|
| | | Yes | No | | | |
| Verify Signed Statement of Responsibility | 5 (C) (i) The developer's signed statement accepting responsibility for maintenance until the maintenance responsibility is legally transferred to another party; | Partial | | | Addressing questions and concerns regarding signed statement accepting responsibility for maintenance until the maintenance responsibility is legally transferred to another party is discussed during Site Plan Review meetings and comments are provided to contractors and developers regarding any concerns in reference to the plans that are submitted, but wasn't adequately documented in 2020. This will be a common documented comment in 2020. The City's ordinance makes the owner and occupant responsible for maintenance of BMPs. | Public Works Dept. Infrastructure Mngt. |
| Verify Sales or Lease Agreement | 5 (C) (ii) Written conditions in the sales or lease agreement that require the recipient to assume responsibility for maintenance; | Partial | | | Addressing questions and concerns during Site Plan Review meetings and comments are provided to contractors and developers regarding any concerns they may have in reference to the project, but wasn't adequately documented in 2020. This will be a common documented comment in 2020. The City's ordinance makes the owner and occupant responsible for maintenance of BMPs. | Public Works Dept. Infrastructure Mngt. |
| Verify Responsibilities of Homeowner's Association | 5 (C) (iii) Written conditions in project conditions, covenants and restrictions for residential properties assigning maintenance responsibilities to a home owner's association, or other appropriate group, for maintenance of structural and treatment control management practices; and/or | Partial | | | Addressing questions and concerns regarding written conditions in project conditions, covenants and restrictions for residential properties assigning maintenance responsibilities to a home owner's association are discussed during Site Plan Review meetings and comments are provided to contractors and developers regarding any concerns in reference to the plans that are submitted, but wasn't adequately documented in 2020. This will be a common documented comment in 2020. The City's ordinance makes the owner and occupant responsible for maintenance of BMPs. | Public Works Dept. (Infrastructure Mngt. & Engineering Division) |

SECTION I (Continued):

| E. Post-Construction Storm Water Management in New Development and Redevelopment: | | | | | | |
|---|---|----------------|----|---|---|--|
| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
| | | Yes | No | | | |
| Verify Written Agreement that Would Reimburse the City | 5 (C) (iv) Written agreement that would allow the City the authority to recover costs of necessary maintenance from the responsible party. | Partial | | | Addressing questions and concerns during Site Plan Review meetings and comments are provided to contractors and developers regarding any concerns they may have in reference to the project, but wasn't adequately documented in 2020. This will be a common documented comment in 2020. The City's | Public Works Dept. (Infrastructure Mngt. & Engineering Division) |
| Verify Agreement for Permanent Responsibility | 5 (C) (v) Any other legally enforceable agreement that assigns permanent responsibility for maintenance of structural or treatment control management practices. | Partial | | | Addressing questions and concerns during Site Plan Review meetings and comments are provided to contractors and developers regarding any concerns they may have in reference to the project, but wasn't adequately documented in 2020. This will be a common documented comment in 2020. The City's ordinance makes the owner and occupant responsible for maintenance of BMPs. | Public Works Dept. (Infrastructure Mngt. & Engineering Division) |
| Maintain Inventory of Structural Controls | 5 (D) Maintain an up-to-date inventory of structural controls and management practices. The inventory shall list structural controls/management practices that the City maintains and also list separately others that have been privately implemented since the date of this permit issuance as a result of the City's ordinance. The City shall document the inventory of structural controls (type and location of structural control/management practice) and submit it on its annual reports to MDEQ. Structural controls/management practices required by Jackson's program shall, as appropriate, include: | Partial | | | We document structural controls and management practices during Site Plan Review. We do not have a document of the inventory of structural control/management practices. | |
| Maintain Inventory | 5 (D) (i) Storage practices such as wet ponds and extended-detention outlet structures. | X | | | Addressing questions and concerns during Site Plan Review meetings and comments are provided to contractors and developers regarding any concerns they may have in reference to the project. | Public Works Dept. (Infrastructure Mngt. & Engineering Division) |
| Maintain Inventory | 5 (D) (ii) Filtration practices such as grassed swales, bio-retention cells, sand filters and filter strips. | X | | | Addressing questions and concerns regarding Filtration practices such as grassed swales, bio-retention cells, sand filters and filter strips during Site Plan Review meetings and comments were provided to contractors and developers regarding any concerns of plans that were submitted. | Public Works Dept. (Infrastructure Mngt. & Engineering Division) |

SECTION I (Continued):

E. Post-Construction Storm Water Management in New Development and Redevelopment:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|---|---|----------------|----|---|---|--|
| | | Yes | No | | | |
| Maintain Inventory | 5 (D) (iii) Infiltration practices such as infiltration trenches and pervious concrete. | X | | | Addressing questions and concerns regarding infiltration practices such as infiltration trenches and pervious concrete in Site Plan Review meetings and comments were provided to contractors and developers regarding any concerns of plans that were submitted. | Public Works Dept. (Infrastructure Mngt. & Engineering Division) |
| | 5 (E) Ensure the appropriate implementation of the structural controls/management practices by considering the following: | X | | | An inventory of structural stormwater controls was developed and inspections of these structural controls were conducted. | Public Works Dept. (SWNIP staff) |
| Review Pre-Construction Design of BMPs | 5 (E) (i) Pre-construction review of BMP design | X | | | Contractors and developers are issued construction site brochures with BMP requirements at the time they pick up a site plan review application. We address questions and concerns regarding Pre-construction review of BMP design in Site Plan Review meetings and comments are provided to contractors and developers regarding any concerns of plans that were submitted. | Public Works Dept. Site Plan Review Committee |
| Inspect BMPs During Construction | 5 (E) (ii) Inspections during construction to verify BMPs are built and properly designed | X | | | Routine inspections are being completed to ensure that the appropriate BMPs are in place. | Public Works Dept. (SWNIP staff) |
| Complete Post-Construction Inspection of BMPs | 5 (E) (iii) Post-Construction inspection and maintenance of BMPs | | | | Some post-construction inspections of maintenance of BMPs were performed. The City is training building inspection personnel to perform construction site inspections. This will facilitate the availability of the Engineering Division stormwater personnel to perform post-construction inspection of the maintenance of BMPs. The City has a procedure to not issue a Certificate of Occupancy that allows use of commercial and large residential developments until a final inspection of the permanent BMPs is passed. | Public Works Dept. (SWNIP staff) |

SECTION I (Continued):

| E. Post-Construction Storm Water Management in New Development and Redevelopment: | | | | | | |
|---|--|----------------|----|--|--|--|
| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
| | | Yes | No | | | |
| Enforce Penalty Provisions for Non-Compliance | 5 (E) (iv) Penalty provisions for non-compliance according to the Enforcement Response Plan (ERP). | X | | | We have implemented a Stop Work Order to enforce the City of Jackson Stormwater Quality Protection ordinance. | Public Works Dept. (SWNIP staff) |
| Enforce Landscaping Ordinance | 5 (F) Enforce the Landscaping Ordinance requiring green space, tree planting, parking islands, buffers, etc. This ordinance shall be reviewed annually to assess the need for update and/or revision. During the next annual review, following permit issuance, the City should consider the inclusion of additional non-structural BMPs such as: protection of sensitive areas (i.e., wetlands and riparian areas), maintenance and/or enlargement of open spaces, buffers along intermittent and perennial water bodies and minimization of impervious surfaces. The results of the annual ordinance reviews shall be documented by the City. | X | | | City of Jackson Landscape Ordinance is in place. Lists of self-sustainable plants are recommended to include in the Site Plan Review Application to ensure that the City encourages developers to consider using self-sustaining vegetation. | Public Works Dept. & Planning Dept. |
| Conduct One Pre-Construction Inspection | 5 (G) Conduct and document at least one pre-construction review of structural control/management practice design. | X | | | During the Site Plan Review process at least one developer is instructed to use energy dissipation on outfalls or comments are made about detention. | Public Works Dept. (SWNIP staff) |
| Conduct Inspection During Construction | 5 (H) Conduct and document at least one site inspection during construction to verify structural controls/management practices are built and properly designed. The City shall document the number of construction sites conducted. | X | | | At least one site was told to improve their outfall for energy dissipation. The use of a building was denied by withholding a certificate of occupancy until the post-construction structural control was correctly installed. | Public Works Dept. (SWNIP staff) |
| Inspect All Permanent Structural Controls Within the City's MS4 | 5 (I) Conduct and document inspections of all permanent structural controls/management practices within the City's MS4 (Both private and City owned) to ensure their proper operation and maintenance. The City shall inspect all of the existing structures and permanent management practices during the first two years of the permit. The City shall re-inspect all of the structures and permanent BMPs on a rotating basis over the next three years. Structures found in need of maintenance and/or repair will be scheduled for a greater frequency of inspection. The documentation should include the type and location (latitude and longitude coordinates) of the structural control/management practice, the date of inspection, the name of the inspector, any deficiencies and a corrective action plan schedule. | | X | Due to limited resources, the City was not able to perform all required inspections. The City is assessing its available resources to perform all inspections. | The City inspected 4 sites in 2020. The City is training building inspection personnel to perform construction site inspections. This will facilitate the availability of the Engineering Division stormwater personnel to conduct and document inspections of more permanent structural controls/management practices within the City's MS4. The main focus of our resources in 2020 were active sites with disturbed ground. | Public Works Dept. (SWNIP staff) |

SECTION I (Continued):

E. Post-Construction Storm Water Management in New Development and Redevelopment:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (If not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|---|----------------|----|---|--|--|
| | | Yes | No | | | |
| Evaluate Potential Water Quality Impacts | 5 (J) Evaluate the potential water quality impacts in the engineering and design of future flood management structures/projects. | X | | | Engineering Division oversees drainage improvement projects for creek tributaries in the City. A checklist was developed to include criteria used and considered during drainage improvement projects. | Public Works Dept. (SWMIP staff, Engineering Division) |
| Submit Annual Report to MDEQ | 5 (K) The City shall submit an Annual Report in the approved format to MDEQ by the 28th day of each January for the previous calendar year. The report shall include the status of the City's efforts in meeting each measurable goal of this minimum measure listed above. | | | | | |

SECTION I (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|-----------------------------------|--|----------------|----|---|---|--|
| | | Yes | No | | | |
| Develop & Implement O & M Program | 6 (A) Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from the City of Jackson's operations. The program shall include the following components. | | | | <p>The City of Jackson Stormwater Management Program developed a SWPPP for each of the identified City facilities. The SWPPP focuses on identifying and giving a description of potential pollutants sources. There is also a quarterly report that is due each quarter in which each facility is to at least once conduct and discuss stormwater issues. Facility managers are reminded to make sure their field staff are trained to be aware of potential pollutants so they can identify and document illicit discharges and report them to the appropriate staff person. Additionally, we issue BMP for Municipal Facilities to each of the City facilities. Supervisory personnel with construction and facilities management responsibilities were trained how to protect stormwater on December 31, 2020.</p> | Public Works Dept. (SWMIP staff) |
| | | X | | | | |
| | | | | | | |
| Continue Maintenance Schedule | 6 (A) (i) Continue program of cleaning out storm sewer inlets, catch basins, storm sewers and drainage channels according to the schedules outlined in the City's Operations and Maintenance Policy Manual. Inspections, maintenance and cleanings shall be documented in a log maintained by the City and shall be available for MDEQ inspection. | X | | | <p>The City of Jackson Infrastructure Management Division handles all maintenance issues and concerns related to cleaning out storm sewer inlets, catch basins, storm sewers and drainage channels.</p> | Public Works (Infrastructure Mngt.) |
| Review & Update O & M Policy | 6 (A) (ii) Maintain the City's Operation and Maintenance Policy Manual through annual reviews/updates. At a minimum the City shall: | X | | | | |
| | 6 (A) (ii) (a) Inspect entire drainage system, twice a year | X | | | <p>The City conduct drainage system inspections as workers are in the field conducting routine maintenance activities.</p> | Public Works (Infrastructure Mngt.) |
| | 6 (A) (ii) (b) Inspect all drainage areas capable of obstructions identified in Appendix J, monthly during dry weather season. | X | | | <p>This information is on file and available for review. There are 58 areas that have been identified to be inspected annually</p> | |

SECTION I (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|----------------------------------|---|----------------|----|---|---|--|
| | | Yes | No | | | |
| | 6 (A) (ii) (c) Inspect all drainage areas capable of obstructions identified in Appendix J, bi- monthly during wet weather season. | X | | | The City of Jackson Infrastructure Management Division handles all maintenance issues and concerns related to cross-drains, culverts, underpasses, storm sewer inlets, etc. | Public Works (Infrastructure Mngt.) |
| | 6 (A) (ii) (d) Inspect all drainage areas capable of obstructions identified in Appendix J, prior to an anticipated 10 year, 24-hour rain event and after such an event occurs. The Bridges and Drainage Maintenance Division will remove trash, obstructions, or any other natural occurring debris from within the drainage system upon notification and the Department of Public Works shall maintain the drain inlets. The inspections maintenance shall be documented on the "Department of Public Works Drainage Maintenance and Inspection Log" and/or the Department of Public Works Inlet Maintenance Flood Prevention Report, Exhibit E." | X | | | The City of Jackson Infrastructure Management Division handles all maintenance issues and concerns related to cross-drains, culverts, underpasses, storm sewer inlets, etc. Records are maintained in the City's Cityworks system where complaints, service requests, and work orders are entered, distributed, tracked, closed, and reviewed. | Public Works (Infrastructure Mngt.) |
| Continue Street Sweeping Program | 6 (A) (iii) Continue program of sweeping at least 400 miles per year of curb and gutter arterial roadways. The City shall annually document the number of miles swept, the amount of waste collected and the disposal locations. The City must ensure that water and material will not re-enter the MS4. | | X | The City of Jackson is in the process of procuring repair services for its street sweepers. | The City of Jackson performed less than 100 miles of street sweeping in 2020 due to the need for equipment repairs and revenues. There has been removal of debris by Vacuum trucks. The City is considering the use of screens to prevent debris from getting into the system during 2020. The City has begun determining how to track measures that prevent or remove debris from the MS4. Downtown Jackson Partners collected 61,076 pounds of trash and emptied trash cans 34,650 times. | Public Works Dept. (Infrastructure Mngt. Division) |
| Continue Use of Sand for Deicing | 6 (A) (iv) Continue the use of sand for deicing emergencies in lieu of salt or other deicing chemicals to minimize stormwater impacts. Sand shall be swept for reuse and to prevent its runoff as soon as the ice melts. Sand shall be stored in a covered or contained location. | X | | | Documentation for sand and de-icing usage is updated in the operations & maintenance procedures as needed by the Infrastructure Management Division. | Public Works Dept. (Infrastructure Mngt. Division) |

SECTION I (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|--|----------------|----|---|--|--|
| | | Yes | No | | | |
| Evaluate O & M Programs for Public Right-of-Ways and Drainage Channels | 6 (A) (v) Continue to evaluate existing O & M programs for public right-of-ways and drainage channels to ensure these programs limit the discharge of pollutants from pesticides, herbicides, fertilizers and landscape debris. [40 CFR 122.26 (d)(2)(iv)(A)(6)] | X | | | City continues to follow the existing operations & maintenance procedures for all maintenance activities. Employees are also reminded to protect our water ways by keeping pesticides, herbicides, fertilizers and landscape debris on the lawn to prevent the material from becoming runoff in the event of inclement weather. | Public Works Dept. |
| Implement Practices | 6 (B) In addition to implementing the existing "pollution prevention/good housekeeping program for municipal operations" BMPs identified in section (A) above, the City must implement the following practices. The plan must describe and include individual BMPs, measurable goals, and responsible persons for this program. At a minimum the City must: 6 (B) (i) Develop and implement an employee-training program to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. This program must identify any existing or available materials the City of Jackson plans to use. The training program should be coordinated with the outreach programs developed for the public information minimum measure and the illicit discharge minimum measure. The City must document and report annually to MDEQ the number of employee-training programs conducted and the number of employees trained. | | | | The City of Jackson Stormwater Management Program developed a SWPPP for each of the identified City facilities. The SWPPP focuses on identifying and giving a description of potential pollutants sources. There is also a quarterly report that is due each quarter in which each facility is to at least once conduct and discuss stormwater issues. Facility managers are reminded to make sure their field staff are trained to be aware of potential pollutants so they can identify and document illicit discharges and report them to the appropriate staff person. Additionally, we issue BMP for Municipal Facilities to each of the City facilities. Supervisory personnel with construction and facilities management responsibilities were trained how to protect stormwater on December 31, 2020. | Public Works Dept. (SWMP staff) |
| Implement Employee Training Program for Public Information & Illicit Discharge | | X | | | | |

SECTION I (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|---|--|----------------|----|---|--|---|
| | | Yes | No | | | |
| Obtain Permits for City Owned Industrial Facilities with Storm Water Discharges | 6 (B) (ii) Obtain permits for all storm water discharges associated with industrial activity as defined in 40 CFR 122.26(b)(14)(i) – (xi) that the City owns and operates. The City must evaluate these regulations for applicability and ensure that all City owned or operated industrial activities have appropriate permit coverage. The City must also include a list of industrial facilities in the first annual report for those listed in 40 CFR 122.26(b)(14)(i) – (ix) and (xi)] that the City of Jackson owns or operates which are covered by General Storm Water Permits or have individual NPDES Storm Water Permits. Such facilities may include, but not limited to, wastewater treatment plants with flows of 1 MGD or more, airports, landfills, dirt pits, transportation facilities with maintenance shops, and recycling facilities. | X | | | The City has developed a list of city owned facilities for which SWPPPs were implemented. | Public Works Dept. (SWMP staff) |
| Maintain SWPPPs for Municipal Facilities | 6 (C) The City must maintain its Storm Water Pollution Prevention Plans (SWPPP) for all listed municipal operations. | X | | | SWPPPs were implemented at identified City owned facilities. SWPPPs are kept on file at each facility and by the Storm Water Management Program Staff. | Public Works Dept. (SWMP staff) |
| Continue to Update & Maintain an Inventory of Municipal Facilities | 6 (C) (i) The City must continue to update and maintain an inventory of municipally-owned or operated facilities and storm water controls, including but not limited to the following: <ul style="list-style-type: none"> -Composting facilities. -Equipment storage and maintenance facilities -Hazardous waste handling and transfer facilities -Landfills -Landscape maintenance on municipal property -Materials storage yards -Public buildings, including schools, libraries, police stations, fire station, municipal buildings, and similar buildings -Public parking lots -Public works yards -Recycling facilities -Solid waste handling and transfer facilities -Street repair and maintenance sites -Vehicle storage and maintenance yards -Municipally-owned and/or maintained structural storm water controls | X | | | The City updates and maintains inventory of municipally-owned or operated facilities and storm water controls. | Public Works Dept. (Solid Waste Division, Infrastructure Mngt. Division, Water/Sewer) |
| Maintain List of Municipal Facilities for Review by MDEQ | 6 (C) (ii) The list of municipally-owned or operated facilities and storm water controls must be maintained and available for review by MDEQ. | X | | | The City updates and maintains inventory of municipally-owned or operated facilities and storm water controls. | Public Works Dept. (Solid Waste Division, Infrastructure Mngt. Division, Water/Sewer) |

SECTION I (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|---|--|----------------|----|---|--|---|
| | | Yes | No | | | |
| <p>Identify Municipal Facilities on the Water Basin Map</p> | <p>6 (C) (iii) The municipally-owned or operated facilities must be located and identified on the City of Jackson Water Basin Map. The map will then identify the storm water outfalls corresponding to each of the facilities as well as the receiving waters to which these facilities discharge. The map must be maintained and updated annually and be available for review by MDEQ.</p> | X | | | <p>The City updates and maintains inventory of municipally-owned or operated facilities and storm water controls. There were no known changes in 2020.</p> | <p>Public Works Dept. (Solid Waste Division, Infrastructure Mngt. Division, Water/Sewer)</p> |
| <p>Maintain & Update SWPPs & Spill Response Plans for Municipal Facilities</p> | <p>6 (C) (iv) The City must complete the Storm Water Pollution Prevention and Spill Response Plan for each of the municipally owned or operated facilities required by (1) above and found in Appendix 1. The completion of this site specific plan will provide a comprehensive assessment of the pollutants; the pollutant discharge potential and the best management practices used to eliminate or reduce the pollutant and discharge potential. The plan must also identify the manager of each facility and their contact information and be updated as necessary.</p> <p>A copy of the facility-specific plan must be maintained and be available for review by MDEQ. The plan must be kept on-site at each of the municipally-owned or operated facilities' offices for which it was completed or if an office does not exist, be kept downtown in the Municipal Office Building</p> <p>The City must install, implement and maintain these control measures identified in the plan and updated as necessary.</p> | X | | | <p>The City has developed a Storm Water Pollution Prevention and Spill Response Plan to provide assistance to all of our Facility Managers to guide them on developing and maintaining SWPPP and Spill Response Plan for their facility.</p> | <p>Public Works Dept.</p> |
| <p>Identify High Priority Municipal Sites</p> | <p>6 (C) (v) Based on the plans required by (3.04) above, the City must identify as "high-priority" those facilities that have a high potential to generate storm water pollutants. Among the factors that must be considered in giving a facility a high priority ranking is the amount of urban pollutants stored at the site; the identification of improperly stored materials, activities that should not be exposed to storm (e.g., changing automotive fluids, chemical storage), proximity to perennial water bodies, poor housekeeping practices, and discharge of pollutant(s) of concern (nutrients, sediment, BOD) to impaired water(s). High priority facilities must include maintenance yards, hazardous waste facilities, fuel storage locations, and any other facilities at which chemicals or other materials have a high potential to be discharged in storm water.</p> | X | | | <p>The City continues to maintain appropriate levels of controls at all municipal facilities that have potential to contribute to water quality impairment.</p> | <p>Public Works Dept.</p> |

SECTION I (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (If not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|---|--|----------------|----|---|--|--|
| | | Yes | No | | | |
| Complete Quarterly Reports for High Priority Municipal Facilities | 6 (C) (vi) Those facilities designated "high priority" will be assessed at least once per quarter. A comprehensive inspection including all storm water controls, must be performed, with specific attention paid to waste storage areas, dumpsters, vehicle and equipment maintenance/fueling areas, material handling areas, and similar potential pollutant-generating areas. The quarterly inspection results must be documented and records kept with the plan. This inspection must be done in accordance with the developed requirements in the plan. The inspection report must also include any identified deficiencies and the corrective actions taken to fix the deficiencies. | X | | | Comprehensive inspections are being completed on all high priority facilities. | Public Works Dept. |
| Complete Annual Reports for Non High Priority Facilities | 6 (C) (vii) Those facilities not designated "high priority" will be assessed annually with the results documented and maintained with the plan. The documentation must include the results of the initial assessment, any identified deficiencies and corrective actions taken. Corrective actions should be taken within 14 days of identifying the deficiency or before the next storm event, whichever comes first. | X | | | Comprehensive inspections are being completed on all high priority facilities. | Public Works Dept. |
| Continue to Implement Spill Prevention & Response Plan | 6 (C) (viii) Continue to implement the City's Spill Prevention and Response Plan, which contains procedures to prevent, contain, and respond to spills from municipal and other vehicles. Inspection of all municipal vehicles, solid waste collection vehicles, containerized trucks, street sweepers, vacuum trucks and fuel trucks shall be performed monthly or as often as necessary to prevent spills and leaks from occurring. Continue to implement the Storm Water Pollution Prevention Plan (SWPPP) for the engineering maintenance facility. These plans shall be evaluated annually and modified as necessary. The results of the evaluation shall be documented by the City. | X | | | The City has implemented a Spill Prevention and Response Plan and we update as needed. | Public Works Dept. |
| | 6 (C) (ix) The City's program must specifically address the following areas: | | | | | |

SECTION I (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--------------------------|--|----------------|----|---|---|---|
| | | Yes | No | | | |
| | 6 (C) (ix) (a) Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables (including froth, oil and floating solids) and other pollutants to the storm sewer system. | X | | | The City maintains, implements, and inspects the City for maintenance issues and if litter needs to be scheduled for pick up to maintain a certain areas, a 311 call is completed and we schedule the crew to go out and remove the solids. | Public Works Dept. (Infrastructure Mngt., Solid Waste Division) |
| | 6 (C) (ix) (b) Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, sand storage locations and waste transfer stations. | X | | | The City has inspectors who are trained to go out on a routine basis to detect and record any pollutants that may affect the quality of life for our citizens. The complaints and issues are tracked in 311. | Public Works Dept. (Infrastructure Mngt., Solid Waste Division) |
| | 6 (C) (ix) (c) Procedures for the proper disposal of waste removed from the City's storm sewer system and other operations, including dredge spoil, accumulated sediments, floatables, and other debris. | X | | | The City has inspectors who are trained to go out on a routine basis to detect and record any pollutants that may affect the quality of life for our citizens. | Public Works Dept. (Solid Waste Division) |
| | 6 (C) (ix) (d) Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices. (See ACT(E)(4) for examples.) | X | | | The City has procedures in place to ensure that new flood management projects are properly assessed. | Public Works Division (Water Sewer, Engineering, Solid Waste Divisions |
| | 6 (C) (x) Develop and implement a program to monitor pollutants in runoff from any operating or closed municipal landfills or other treatment, storage or disposal facilities for municipal waste, which shall identify priorities and procedures for inspections and establishing and implementing control measures for such discharges [40 CFR 122.26 (d)(2)(v)(A)(5)] | | X | | This level of inspection was previously performed by consultants who were properly equipped. Losses in personnel resources has left the City with staffing and training needs. The City is seeking training sources for current staff and considering consultants for 2020. | Public Works Dept. (Infrastructure Mngt., Solid Waste Division) |

SECTION I (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practices | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|--|----------------|----|---|---|--|
| | | Yes | No | | | |
| | 6 (C) (xi) Vehicle maintenance activities performed by the City shall be addressed. Vehicle maintenance activities include assign or changing fluids including fuel, lubrication, mechanical repairs, parts degreasing, and vehicle or equipment washing. This permit does not authorize the discharge of municipal vehicle wash water. Vehicles and equipment shall be maintained for clean and effective operation to prevent impacts on storm water quality. | | | | | |
| | <p>Example BMPs at maintenance facilities include:</p> <ul style="list-style-type: none"> -Implementation of a spill prevention program -Addressing spills and leaks that happen during fuel or oil delivery -Installation of spill and overflow protection devices -Discouraging the topping off of fuel tanks -Preventing rainfall on or storm water run-on to fueling areas -Prohibiting the hosing or washing down of fueling areas and using dry cleanup methods for fueling area spills (sweeping and using oil absorbent products) -Checking for leaking oil and fluids on all vehicles -Draining oil filters for disposing or recycling -Prohibiting the pouring of liquid waste onto the ground, into State waters or drains -Providing sufficient storage for used oil -Recycling engine fluid and batteries -Segregating and labeling waste -Buying recycled products -Properly training employees -Routinely inspecting tanks and equipment for leaks -Installing secondary containment around above ground liquid storage tanks -Placing outside materials and products under roof -Using temporary covers, drip pans, diversion dikes and buffer zones -Providing security -Installing oil & water separators -Implementing waste reduction practices -Using "environment friendly (i.e. biodegradable detergents)" products | X | | | <p>The City of Jackson Stormwater Management Program developed a SWPPP for each of the identified City facilities. The SWPPP focuses on identifying and giving a description of potential pollutants sources. Facility managers are reminded to make sure their field staff are trained to be aware of potential pollutants so they can identify and document illicit discharges and report them to the appropriate staff person. Additionally, we issue an Automotive Repair and Maintenance Facility Best Management Practice brochure for Storm Water Pollution Prevention to the Fire and Municipal Garage to each of the City facilities and Supervisory personnel with construction and facilities management responsibilities were trained how to protect stormwater on December 31, 2020.</p> | Public Works Dept. (SWMP staff) |
| Maintain & Update SWPPP for Municipal Garage | 6 (D) (i) Implement the following actions for the City's Municipal Garage: (i) The generic SWPPP and Spill Response Plan developed by the City (dated Nov 2009) shall be used as a template to develop a specific plan for the Municipal Garage. All BMPs in the plan shall take place immediately or within 6 months of the date of permit issuance. At a minimum the plan shall contain the following: | X | | | <p>City facilities SWPPPs and Spill Response Plan have been developed. We issued an Automotive Repair and Maintenance Facility Best Management Practice brochure for Storm Water Pollution Prevention to the Fire and Municipal Garage staff.</p> | Public Works Dept. |

SECTION I (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practices | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|--|--|----------------|----|---|--|--|
| | | Yes | No | | | |
| Apply Drip Pans to Wrecked or Damaged Vehicles | 6 (D) (ii) As wrecked or damaged vehicles arrive place drip pans under them immediately, even if it is believed that all fluids have leaked out before the vehicle reached the garage. | X | | | The City has SOP's that addresses issues and concerns related to properly draining and recycling fluids from City vehicles. In addition, we issue an Automotive Repair and Maintenance Facility Best Management Practice brochure for Storm Water Pollution Prevention to the Fire and Municipal Garage staff. | Public Works Dept. |
| Transfer Used Fluids to Proper Waste or Recycling Containers | 6 (D) (iii) Promptly transfer used fluids to the proper waste or recycling containers. Do not leave full drip pans or other containers open or exposed to storm water. | X | | | The City has SOP's that addresses issues and concerns related to properly draining and recycling fluids from City vehicles. The Garage has a waste oil container for fluids and does not leave drip pans or open containers exposed. | Public Works Dept. |
| Drain All Fluids in Vehicles | 6 (D) (iv) Drain all fluids, including air conditioner coolant, from wrecked vehicles and "parts" cars. Also drain engines, transmissions, and other parts that contain fluid. | X | | | The City has SOP's that addresses issues and concerns related to properly draining fluids from City vehicles. | Public Works Dept. |
| Store Cracked Batteries in Second Containment | 6 (D) (v) Store cracked batteries in non-leaking secondary container. Do this with all cracked batteries, even if you think all the acid has drained out. If a battery is dropped, or comes from a wrecked vehicle place in secondary containment. | X | | | The City has an approved EMS committee that has been properly trained to handle leaks from wrecked vehicles. | Public Works Dept. |
| Recycle Fluids & Batteries | 6 (D) (vi) Used oil and oil filters, antifreeze and batteries shall be sent to offsite recycling facilities. | X | | | The City utilizes our Environmental Service Center to properly dispose of used oil, oil filters, antifreeze, batteries, paint and more. The City fleet gets oil changes at oil and lube businesses. | Public Works Dept. (Solid Waste Division) |
| Recycle Fluids or Dispose of Properly | 6 (D) (vii) Fluids such as degreasers, solvents, transmission and hydraulic fluid shall also be recycled if feasible. If not they shall be disposed of properly. Under no circumstances shall be poured down a drain or washed or hosed down with water. | X | | | The City utilizes our Environmental Service Center to properly dispose of used oil, oil filters, antifreeze, batteries, paint and more. | Public Works Dept. (Solid Waste Division) |
| Follow Spill Response Plan | 6 (D) (viii) Petroleum contaminated soil shall be removed and disposed of properly. | X | | | The City conducts trainings and has SOP's in place to ensure we are in compliance with our measurable goal. No problems this year. | Public Works Dept. |

SECTION I (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|---|---|----------------|----|---|---|--|
| | | Yes | No | | | |
| Followup Spill Response Plan | 6 (D) (ix) Petroleum contaminated pavement shall have sorbet material applied and disposed of properly. | X | | | The City conducts trainings and has SOP's in place to ensure we are in compliance with our measurable goal. | Public Works Dept. |
| Park Vehicles Minimum 15 Feet from State Waters | 6 (D) (x) Vehicles shall not be parked within 15 feet of a water of the state (ditches, drains, swales, etc.). This practice shall be implemented immediately upon issuance of the permit. Existing vehicles that are within 15 feet of a water of the State shall be moved within 6 months of the date of this permit. | X | | | The City maintains buffer zones to ensure that we are in compliance with our measurable goal. Vehicles that were once parked along fence line near creek have been removed & an appropriate buffer zone is now being preserved. | Public Works Dept. |
| Sell, Recycle, or Property Store Vehicle Parts | 6 (D) (xi) Vehicle parts shall be sold, recycled, or put under storm resistant shelters within 6 months of the date of this permit. | X | | | The City has SOP's in place to ensure that we stay in compliance with our measurable goal. There is an 18 wheeler on site which is covered for storage of used parts. | Public Works Dept. |
| Auction 100 Vehicles Minimum Annually | 6 (D) (xii) A minimum of 100 vehicles shall be auctioned or sent to permitted and licensed scrap yards yearly. | X | | | The City has auctions throughout the year to reduce the inventory at our impound lot, potential pollution sources, and the amount of space used for storage. 170 Vehicles were auctioned in 2020. | Public Works Dept. |
| Ensure Vehicles are Washed in Appropriate Areas & Wash Water is Treated Properly | 6 (D) (xiii) Vehicle wash water from the outside washing bay shall be collected and sent to the City sewer or shall be treated via an oil/water separator. The connection to the City sewer or oil/water separator shall be installed within 6 months of the date of issuance of this permit. | X | | | The City has oil/water separators at the Fire garage. Vehicle washing is commonly done at vehicle washing businesses. | Public Works Dept. |
| Implement Lidded Dumpsters | 6 (D) (xiv) The facility shall have lidded dumpsters. | Partial | | | The Municipal and Fire Garages have a dual lid dumpster. Both dumpsters have 1 lid that needs a repair. | Public Works Dept. (SWMIP Staff) |
| Provide Training for Personnel Responsible for Complying with Requirements of this Permit | 6 (D) (xv) Initial training for all personnel that are responsible for implementing and/or complying with the requirements of this permit shall be performed within 6 months of permit issuance. Newly hired employees responsible for implementing and/or complying with the requirements of this permit, including inspections, shall receive initial training prior to performing such responsibilities. All employees responsible for implementing and/or complying with the requirements of the SWMP and/or SWPPP shall receive refresher training every five years. | X | | | Supervisory personnel with construction and facilities management responsibilities were trained how to protect stormwater on December 31, 2020. | Public Works Dept. (SWMIP Staff) |

SECTION 1 (Continued):

F. Pollution Prevention/Good Housekeeping for Municipal Operations:

| Best Management Practice | Measurable Goal | In Compliance? | | Date Completed (if not, date to be completed) | Comments | Responsible Individual (Name or Job Title) |
|------------------------------|---|----------------|----|--|----------|---|
| | | Yes | No | | | |
| Submit Annual Report to MDEQ | 6 (E) The City shall submit an Annual report in the approved format to MDEQ by the 28th day of each January for the previous calendar year. The report shall include the status of the City's efforts in meeting each measurable goal of this minimum measure listed above. | | | | | |

SECTION III: MONITORING, WATER QUALITY STANDARDS, UNIDENTIFIED WATERBODIES AND EXPENDITURES AND BUDGETS

During this reporting period, has the City collected and analyzed monitoring data as part of the SWMP implementation? YES NO
 If yes, attach copies of the analytical results.

During this reporting period, has the City determined that a water quality standard has been violated? YES NO
 If yes, attach a summary of the date, parameter, nearest sampling station, waterbody and how discovered.

During this reporting period, have any previously unidentified waterbodies receiving storm water discharges been identified? If yes, please identify the waterbody and location. YES NO

Please complete the following table to demonstrate that the City's annual budget reflects the projected expenditures for program implementation.

| Forecast Year | Annual Projected Expenditures for Forecast Year (dollars) | Budget for Forecast Year (dollars) |
|---------------|---|------------------------------------|
| 2020 | \$161,825,611.00 | \$161,825,611.00 |

SECTION IV: REPORT CERTIFICATION AND SIGNATURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the MS4 for which I am responsible has in effect, an accurate and up to date Storm Water Management Program (SWMP). I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Authorized Signature (according to ACT10 of the Permit)

June 7, 2021

Date

Dr. Charles Williams, Jr., Ph.D., P.E.

Director of Public Works

Printed Name

Title

Please submit this form to: Chief, Environmental Compliance and Enforcement Division

MDEQ, Office of Pollution Control
P.O. Box 2261
Jackson, Mississippi 39225

SECTION V: Year 9 (2020) REAPPLICATION INFORMATION

| Minimum Measure ID | Title of Document or Procedure | Description and Status of Change | Justification and Comments | Responsible Individual (Name or Job Title) |
|--------------------|--------------------------------|----------------------------------|----------------------------|--|
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This page is currently not applicable.