



Johns Creek

STORMWATER MANAGEMENT PROGRAM 2023

**CITY OF JOHNS CREEK, GEORGIA
PHASE II MS4**

NPDES Permit No: GAG610000

**STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**Prepared By:
THE CITY OF JOHNS CREEK**

Initial Submission: June 4, 2023

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**STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

Storm Water Management Program (SWMP)

General NPDES Permit No. GAG610000 for
Small Municipal Separate Storm Sewer Systems (MS4)

1. General Information

- A. Name of small MS4:** City of Johns Creek
- B. Name of responsible official:** Ed Densmore
Title: City Manager
Mailing Address: 11360 Lakefield Drive,
Johns Creek, Georgia 30097
Telephone Number: 678-512-3200
- C. Designated storm water management program contact:**
Name: Cory Rayburn
Title: Stormwater Utility Manager
Mailing Address: 11360 Lakefield Drive,
Johns Creek, Georgia 30097
Telephone Number: 678-512-3200
Email Address: Cory.Rayburn@johnscreekga.gov
- D. Provide the river basin(s) to which your MS4 discharges:**
Chattahoochee River
- E. Provide the latitude and longitude of the MS4 center using Global Positioning System (GPS) –WG 84:**
Latitude: 34.06038 Longitude: -84.16891

2. Sharing Responsibility

- A. Has another entity agreed to implement a control measure on your behalf?**
Yes _____ No X (If no, skip to Part 3)

Control Measure or BMP:

1. Name of entity _____

2. Control measure or component of control measure to be
implemented by entity on your behalf:


- B. Attach an additional page if necessary to list additional shared responsibilities. **It is mandatory that you submit a copy of a written agreement between your MS4 and the other entity demonstrating written acceptance of responsibility.**

3. **Minimum Control Measures and Appendices**

- Public Education and Outreach
- Public Involvement/Participation
- Illicit Discharge Detection and Elimination
- Construction Site Stormwater Runoff Control
- Post-Construction Stormwater Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping
- Enforcement Response Plan
- Impaired Waters

4. **Certification Statement**

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 upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: Ed Densmore Date: June 1, 2023
Signature:  Title: City Manager
06/01/23

Storm Water Management Program - Minimum Control Measure 1

Public Education and Outreach on Storm Water Impacts

40 CFR Part 122.34(b)(1) Requirement: The permittee must implement a public education program to distribute educational materials to the community and/or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.

See Table 4.2.1(a) of the Permit

MCM 1 – Public Education and Outreach

Best Management Practice #1.1 Municipal Website

1. **Target audience:** General Public
2. **Description of BMP:** Educational articles and information related to stormwater management and pollution prevention will be periodically published on the City's website (www.johnscreekga.gov).
3. **Measurable goal(s):** Each reporting year, a minimum of four posts related to stormwater management and pollution will be published on the City's website.
4. **Documentation to be submitted with each annual report:** Each reporting year, copies of the material posted on the City's website will be provided within the annual report.
5. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): four posts per year
 - d. Month/Year of each action (if applicable): varies
6. **Person (position) responsible for overall management and implementation of the BMP:** The City's Digital Communications Manager will be responsible.
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by the number of website visitors that view the posted information.

MCM 1 – Public Education and Outreach

Best Management Practice #1.2 Land Disturbance Permit Information Packets

1. **Target audience:** Developers and other involved in land disturbance activity
2. **Description of BMP:** Land Disturbance Permit (LDP) information packets will be available on the City's website and at City Hall. LDP packets will be provided to all LDP applicants and permittees.
3. **Measurable goal(s):** Each reporting year, the City will distribute LDP packets to 100% of applicants interested in land disturbance activity.
4. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide documentation of the number of LDP packets distributed. A copy of the LDP packet can be found in Appendix 1.2 – LDP Packet. If revisions to the LDP packet are made during the reporting year and updated copy will be provided in the annual report.
5. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): on-going
 - d. Month/Year of each action (if applicable): n/a
6. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will track the number of time Land Disturbance Permit plans are resubmitted for review to determine if distributing the LDP packets is an effective tool to guide preparation of plans.

MCM 1 – Public Education and Outreach

Best Management Practice #1.3 Ongoing Social Media Program

1. **Target audience:** General Public
2. **Description of BMP:** Articles and events pertaining to stormwater and pollution prevention will be periodically published on the City's Facebook page.
3. **Measurable goal(s):** Each reporting year, a minimum of four posts related to stormwater and pollution prevention will be published on the City's Facebook page.
4. **Documentation to be submitted with each annual report:** Each reporting year, copies of the posts to the City's Facebook page related to stormwater and pollution prevention will be provided within the annual report.
5. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): January 1, 2023
 - c. Frequency of actions (if applicable): four posts per year
 - d. Month/Year of each action (if applicable): varies
6. **Person (position) responsible for overall management and implementation of the BMP:** The City's Digital Communications Manager will be responsible.
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP by the number of views and "shares" of the information. Followers can "share" the information or event, with a click of a button, to all their friends and family they connect with on Facebook.

MCM 1 – Public Education and Outreach

Best Management Practice #1.4 Booth at Community Event

1. **Target audience:** General Public
2. **Description of BMP:** The City will distribute information pertaining to stormwater and pollution prevention at a community event.
3. **Measurable goal(s):** Each reporting year, the City will participate in at least one community event and distribute information pertaining to stormwater and pollution prevention to attendees at the event.
4. **Documentation to be submitted with each annual report:** Each reporting year, the City will submit photographs from the community event, copies of materials distributed, and number of people receiving educational materials.
5. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): varies
6. **Person (position) responsible for overall management and implementation of the BMP:** The City's Stormwater Utility Manager will be responsible.
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP by the number of people with which information is shared.

Stormwater Management Program – Minimum Control Measure 2

Public Involvement/Participation

40 CFR Part 122.34(b)(2) Requirement: The permittee must, at a minimum, comply with State and local public notice requirements when implementing a public involvement/participation program.

See Table 4.2.2 (a) of the Permit

MCM 2 – Public Involvement

Best Management Practice #2.1 Adopt-a-Road

1. **Target audience/stakeholder group:** General Public
2. **Description of BMP:** The City will sponsor an Adopt-a-Road program in which community members and civic groups can learn about litter prevention and “adopt” a section of the road system to help clean up litter.
3. **Measurable goal(s):** Each reporting year, the City will track the miles of adopted roadways.
4. **Documentation to be submitted with each annual report:** Each reporting year, the city will provide documentation of miles adopted roadways, groups/individuals participating in the program, and the amount of litter removed. A map of roadways in the program is included in Appendix 2.1A – Map of Roads and the inventory of roadways in the program is included in Appendix 2.1B – Inventory of Roads.
5. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): varies
 - d. Month/Year of each action (if applicable): varies
6. **Person (position) responsible for overall management and implementation of the BMP:** The City’s Construction Manager will be responsible.
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by the amount of litter removed from the roadways.

SWMP Attachment: Appendix 2.1A – Map of Roads and Appendix 2.1B – Inventory of Roads

MCM 2 – Public Involvement

Best Management Practice #2.2 Stream Cleanup

1. **Target audience/stakeholder group:** General Public
2. **Description of BMP:** The City will host a stream cleanup in which community members and civic groups can learn about litter prevention and remove litter and debris from a stream within the City limits. The City solicits volunteers from local schools and community groups. Typically the event cleans a half-mile segment. The City provides supplies (such as trash bags, gloves, and safety vests) and ensures collected waste is disposed of properly.
3. **Measurable goal(s):** Each reporting year, the City will organize and promote at least one stream cleanup event.
4. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide documentation including a map of the stream section cleaned, photos from the event, and the number of volunteers participating.
5. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): varies
6. **Person (position) responsible for overall management and implementation of the BMP:** The City's Construction Manager will be responsible.
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by the amount of trash and debris removed from the stream.

MCM 2 – Public Involvement

Best Management Practice #2.3 Recycling Event

1. **Target audience/stakeholder group:** General Public
2. **Description of BMP:** The City will organize and promote a recycling event to collect recyclable and reusable materials from citizens that would otherwise be thrown away as trash.
3. **Measurable goal(s):** Each reporting year, the City will organize and promote at least one recycling event.
4. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide documentation of the event including date of the event and photos taken during the event.
5. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): varies; typically June
6. **Person (position) responsible for overall management and implementation of the BMP:** The City's Construction Manager will be responsible.
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The volume of recyclable and reusable materials diverted from landfills will be used to gauge the effectiveness of this BMP.

MCM 2 – Public Involvement

Best Management Practice #2.4 Household Hazardous Waste Disposal Event

1. **Target audience/stakeholder group:** General Public
2. **Description of BMP:** The City partners with a third-party provider for a household hazardous waste disposal event to collect household hazardous waste materials from citizens that would otherwise be accumulated at residential properties or thrown away as trash. The event will be held at a single location where citizens can drop-off materials. Materials accepted will include household hazardous waste such as paint, aerosols, solvent, propane cylinders, and pesticides. The event is staffed by a third-party provider and waste is disposed of through a hazardous materials vendor.
3. **Measurable goal(s):** Each reporting year, the City will partner with a third-party provider to provide at least one household hazardous waste disposal event.
4. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide documentation of the event including date of the event and photos taken during the event.
5. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): varies, typically Fall
6. **Person (position) responsible for overall management and implementation of the BMP:** The City's Construction Manager will be responsible.
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The volume of household hazardous waste collected will be used to gauge the effectiveness of this BMP.

Illicit Discharge Detection and Elimination

40 CFR Part 122.34(b)(3) Requirement: The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges into your small MS4. You must:

- A) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls;
- B) Effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions;
- C) Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to your system; and
- D) Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- E) Address the following categories of non-storm water discharges or flows only if they are identified as significant contributors of pollutants to the MS4:
 - water line flushing;
 - landscape irrigation;
 - diverted stream flows;
 - rising ground waters;
 - uncontaminated ground water infiltration (as defined in 40 CFR Part 35.2005(20));
 - uncontaminated pumped ground water;
 - discharges from potable water sources;
 - foundation drains;
 - air conditioning condensation;
 - irrigation water;
 - springs;
 - water from crawl space pumps;
 - footing drains;
 - lawn watering;
 - individual residential car washing;
 - flows from riparian habitats and wetlands;
 - swimming pool discharges;
 - street wash water; and
 - flows from firefighting activities.

MCM 3 - Illicit Discharge Detection and Elimination

Best Management Practice #3.1 Legal Authority

1. **Description of BMP:** The City adopted the Illicit Discharge and Illegal Connection (IDIC) Ordinance on December 19, 2006. This ordinance provides the City the legal authority to carry out all inspection, monitoring, and enforcement necessary to ensure compliance. The City of Johns Creek is located within the Metropolitan North Georgia Planning District (District) and has adopted the District's minimum requirements pertaining to Floodplain Management (last revised March 16, 2015) and Stream Buffer Protection (last revised February 3, 2020).
2. **Measurable goal(s):** The City will evaluate these ordinances annually and make any necessary modifications.
3. **Documentation to be submitted with each annual report:** If the ordinance is revised during the reporting period, the City will provide a copy of the modified adopted ordinance in the subsequent annual report. The IDIC Ordinance can be found in Appendix 3.1 – IDIC Ordinance.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): n/a
 - c. Frequency of actions (if applicable): revisions as needed
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Successful identification of IDDE sources and elimination of the identified sources will demonstrate the effectiveness of the BMP.

SWMP Attachments: Appendix 3.1A – Illicit Discharge and Illegal Connections to Storm Sewers Ordinance, Appendix 3.1B – Floodplain Management Ordinance, and Appendix 3.1C – Stream Buffer Protection Ordinance

MCM 3 - Illicit Discharge Detection and Elimination

Best Management Practice #3.2 Outfall Inventory and Map

1. **Description of BMP:** The City will maintain an up-to-date outfall inventory and map showing the location of each outfall within the City. The map will include the names and locations of all waters of the State that receive discharges from the outfalls.
2. **Measurable goal(s):** Each reporting year, the map and inventory will be updated at least once to reflect when outfall structures are added, deleted, or corrections are made to errors and omissions.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide a copy of the updated outfall inventory and map including documentation of the total number of outfalls and number of outfalls added during the reporting period. The map of outfalls can be found in Appendix 3.2A – Map of Outfalls and the inventory can be found in Appendix 3.2B – Inventory of Outfalls.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Chief Data Officer will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Successful identification of IDDE sources will demonstrate the effectiveness of this BMP.

SWMP Attachment: Appendix 3.2A – Map of Outfalls and Appendix 3.2B – Inventory of Outfalls

MCM 3 - Illicit Discharge Detection and Elimination

Best Management Practice #3.3 IDDE Plan

1. **Description of BMP:** The City's IDDE Plan details the procedures for performing dry weather screening, source tracking, and illicit discharge elimination.
2. **Measurable goal(s):** The City will conduct dry weather screening (DWS) inspections on 100% of the total outfalls within the five-year permit term. Each reporting year, the City will conduct DWS inspections for at least 5% of the total outfalls. For 100% of instances when the results of the DWS indicate a potential for an illicit discharge the City will follow investigative and follow-up procedures described in the IDDE Plan. If the illicit discharge was produced by an adjacent MS4, the City will notify that MS4. The City will eliminate, to the best of its ability, any identified illicit discharges and implement enforcement procedures described in the City's Enforcement Response Plan.
3. **Documentation to be submitted with each annual report:** Each reporting year, the number of outfalls screened and screening documentation will be provided with the annual report. Additionally, each reporting year, the number of illicit discharges detected, documentation of the illicit discharges, and enforcement actions taken will be provided with the annual report. The DWS inspection forms can be found in Appendix 3.3A – Inspection Form and Appendix 3.3B – Inspection Form (iPad Screen Captures). The updated IDDE Plan can be found in Appendix 3.3C – IDDE Plan. The approved Enforcement Response Plan can be found in Appendix 7 – ERP.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): throughout the year
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP through the number of illicit discharges detected and enforcement actions taken to stop discharges and prohibit future discharges.

SWMP Attachments: Appendix 3.3A Inspection Form, Appendix 3.3B IDDE Plan, Appendix 3.3C Source Tracking Form, Appendix 3.3D Table to Track Outfall Inspections

MCM 3 - Illicit Discharge Detection and Elimination

Best Management Practice #3.4 IDDE Education

1. **Description of BMP:** The City will continue to implement a program to educate the public, businesses, and City employees about the hazards of illicit discharges.
2. **Measurable goal(s):** Each reporting year, the City will conduct at least one educational activity to educate each target audience (public, businesses, and City employees) about the hazards of illicit discharges. To educate the public and businesses, the website will be updated to information about the hazards of illicit discharge. To educate City employees, information on illicit discharge will be distributed.
3. **Documentation to be submitted with each annual report:** Each reporting year, information posted to the website to educate the public and businesses will be documented and submitted in the annual report as part of BMP #1.2. Additionally, each reporting year, copies of information distributed to City employees will be provided within the annual report.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Digital Communications Manager will be responsible for updating the City's website. The City's Land Development Manager will be responsible for distributing information on illicit discharge to City employees.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP by tracking webpage views for the IDDE information and reports of potential illicit discharge received via the website.

MCM 3 - Illicit Discharge Detection and Elimination

Best Management Practice #3.5 Complaint Response

1. **Description of BMP:** Illicit discharge and illegal connection complaints can be submitted by phone, e-mail, and through the City's website. The City maintains a Georgia EPD approved procedure for receiving, investigating, and tracking illicit discharge and illegal connection complaints. To summarize the procedures, complaints are documented and investigated by a trained staff member who identifies any present illicit discharges and takes appropriate enforcement actions to stop the violator(s) and enforce remediation.
2. **Measurable goal(s):** Each reporting year, for 100% of complaints received, the City will document, investigate, and take enforcement actions as necessary.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide documentation of all complaints received (including complaint date, complaint status, and actions taken). The Complaint Response Procedure can be found in Appendix 3.5 – Complaint Response Procedure.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): as complaints are received
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP by ensuring all complaints are documented, investigated, and appropriate enforcement actions are taken.

SWMP Attachments: Appendix 3.5A – Complaint Response Procedure and Appendix 3.5B – Complaint Response Tracking Form

Construction Site Storm Water Runoff Control

40 CFR Part 122.34(b)(4) Requirement: The permittee must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Storm water discharges from construction activity disturbing less than one acre must be included in the permittee's program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include:

- A) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance;
- B) Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;
- C) Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
- D) Procedures for site plan review which incorporate consideration of potential water quality impacts;
- E) Procedures for receipt and consideration of information submitted by the public; and
- F) Procedures for site inspection and enforcement of control measures.

MCM 4 - Construction Site Stormwater Runoff Control

Best Management Practice #4.1 Legal Authority

1. **Description of BMP:** The City's adopted Litter Ordinance requires construction site operators to control waste at the construction site, which includes discarded building materials, concrete truck washout, chemicals, litter and sanitary waste. The City's adopted Soil Erosion, Sedimentation and Pollution Control Ordinance (E&S) establishes requirements, standards, and enforcement procedures for land disturbance activities.
2. **Measurable goal(s):** The City will evaluate the ordinances annually and make any necessary modifications.
3. **Documentation to be submitted with each annual report:** If either or both the ordinances are revised during the reporting period, the City will provide a copy of the modified adopted ordinance(s) in the subsequent annual report. The adopted Litter Ordinance can be found in Appendix 4.1A – Litter Ordinance. The adopted E&S Ordinance can be found in Appendix 4.1B – E&S Ordinance.
3. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): n/a
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable) n/a
4. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager, will be responsible.
5. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by its ability to take action against violators of the Litter Ordinance and E&S Ordinance.

SWMP Attachments: Appendix 4.1A – Litter Ordinance and Appendix 4.1B – E&S Ordinance

MCM 4 - Construction Site Stormwater Runoff Control

Best Management Practice #4.2 Site Plan Review Procedures

1. **Description of BMP:** The City reviews erosion and sedimentation site plans submitted for land disturbing activity permits for sites within the city limits. The site plans are reviewed in accordance with the Georgia Soil and Water Conservation Commission requirements and E&S Ordinance. Land disturbance permits are not issued without an approved soil and erosion construction site plan.
2. **Measurable goal(s):** Each reporting year, the City will review 100% of the site plans submitted for a land disturbance permit within 45 days of submittal.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide a list of site plans received; the number of site plans reviewed, approved, or denied; and the timeframe in which each was addressed. The site plan review procedures and tracking form can be found in Appendix 4.2. The City will provide the number of LDA permits issued.
4. **Schedule:**
 - a. **Interim milestone dates (if applicable):** n/a
 - b. **Implementation date (if applicable):** on-going
 - c. **Frequency of actions (if applicable):** on-going
 - d. **Month/Year of each action (if applicable):** n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by the number of approved plans that comply with the E&S Ordinance.

SWMP Attachments: Appendix 4.2A – Site Plan Review Procedure and Appendix 4.2B – Land Disturbance Permit Review Summary Form

MCM 4 - Construction Site Stormwater Runoff Control

Best Management Practice #4.3 – Inspection Program

1. **Description of BMP:** The City inspects all active construction sites within the City that have obtained a land disturbance permit (LDP). Sites are inspected for compliance with issued permits, the Litter Ordinance, and the E&S Ordinance (which is in accordance with Georgia Soil and Water Conservation Commission (GSWCC) requirements). Inspections are conducted to ensure that structural and non-structural BMPs at construction sites are properly designed, maintained, and construction site waste is properly controlled. Each inspector carries a laminated copy of the inspection checklist and records inspection results in the data management system.
2. **Measurable goal(s):** Each reporting year, the City will conduct inspections at 100% of active construction sites.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide a list of active construction sites during the year and documentation from inspections conducted at those sites. The inspection checklist for active construction sites can be found in Appendix 4.3 – Inspection Checklist.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the inspection program by its ability to identify violations and use enforcement actions to ensure compliance.

SWMP Attachments: Appendix 4.3A – Construction Site Inspections Procedure, Appendix 4.3B – Site Inspection Form, and Appendix 4.3C – Site Inspection Summary Table

MCM 4 - Construction Site Stormwater Runoff Control

Best Management Practice #4.4 - Enforcement Procedures

1. **Description of BMP:** The City maintains a Litter Ordinance and E&S Ordinance that provide legal enforcement authority to address violations documented at construction sites. If a violation of a City ordinance is found then appropriate enforcement action is taken in accordance with the Enforcement Response Plan.
2. **Measurable goal(s):** Each reporting year, for 100% of violations discovered, the City will document, inspect, and address until compliance is maintained and will report the amount of assessed penalties.
3. **Documentation to be submitted with each annual report:** Each reporting period, the City will provide documentation of any enforcement action taken during the reporting period including the number and type (Notice of Violation, Stop Work Order, etc.) and status (i.e. pending, resolved). The Enforcement Response Plan can be found in Appendix 7 – ERP.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness in terms of the level of compliance with enforcement actions.

SWMP Attachments: Appendix 4.4A – Notice of Violation Form, Appendix 4.4B – Stop Work Order Form, Appendix 4.4C – Enforcement Tracking Log

MCM 4 - Construction Site Stormwater Runoff Control

Best Management Practice #4.5 - Complaint Response

1. **Description of BMP:** Erosion and sediment control complaints can be submitted by phone, e-mail, and through the City's website. The City follows its Complaint Response Procedure for receiving, investigating, and tracking complaints. To summarize the procedure, complaints are documented and investigated by a trained staff member who reviews erosion and sediment control issues.
2. **Measurable goal(s):** The City will investigate 100% of erosion and sediment control complaints received within 3 days.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide information on the erosion and sediment control complaints received (including complaint date, type of complaint and complaint status) within the annual report. The Complaint Response Procedure can be found in Appendix 4.5 – Complaint Response Procedure.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the complaint process based on use (if complaints are filed) and resolution (if the complaints can be resolved within the process established).

SWMP Attachments: Appendix 4.5A – Complaint Response Procedure and Appendix 4.5B – Complaint Response Tracking Form

MCM 4 - Construction Site Stormwater Runoff Control

Best Management Practice (BMP) #4.6 - Erosion and Sediment Control Certifications

1. **Description of BMP:** All City staff involved in construction activities subject to the Construction General Permits (plan reviewers, inspectors, and managers) are trained and certified in accordance with the rules of the Georgia Soil and Water Conservation Commission (GSWCC).
2. **Measurable goal(s):** Each reporting year, the City will ensure all staff involved in construction activities are trained and certified in accordance with rules adopted by the GSWCC.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide the number and type of current certifications held by MS4 staff in the annual report.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): certification updates as needed
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by staff compliance with the requirement.

Post-Construction Stormwater Management in New Development and Redevelopment

40 CFR Part 122.34(b)(5) Requirement: The permittee must develop, implement, and enforce a program to address storm water runoff into the MS4 from new development and redevelopment projects, including projects less than one acre if they are part of a larger common plan of development or sale. You must:

- A) Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;
- B) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development or redevelopment projects; and
- C) Ensure adequate long-term operation and maintenance of BMPs.

MCM 5 – Post-Construction Stormwater Management

Best Management Practice #5.1 Legal Authority

1. **Description of BMP:** The City's adopted Post-Construction Stormwater Management for New Development and Redevelopment Ordinance establishes minimum requirements and procedures to control the adverse effects of increased post development stormwater runoff and nonpoint source pollution associated with new development and redevelopment.
2. **Measurable goal(s):** . The City will conduct a comprehensive evaluation during the first year of the permit and submit the results with the first annual report and for the subsequent years of the permit the City will reference the first-year comprehensive evaluation and certify that no additional ordinance revisions are necessary.
3. **Documentation to be submitted with each annual report:** If the ordinance is revised during the reporting period, the City will provide a copy of the modified adopted ordinance(s) in the subsequent annual report. The adopted Post Development Stormwater Management for New Development and Redevelopment Ordinance can be found in Appendix 5.1 – Ordinance for New and Redevelopment.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): n/a
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by its ability to take action against violators of the Post Construction Stormwater Management for New Development and Redevelopment Ordinance.

SWMP Attachments: Appendix 5.1A – Post-Construction Stormwater Management Ordinance and Appendix 5.1B – Center for Watershed Protection's Code and Ordinance Evaluation Tool

MCM 5 – Post-Construction Stormwater Management

Best Management Practice #5.2 – Inventory

1. **Description of BMP:** The City maintains an up-to-date inventory that lists all publicly-owned post-construction stormwater management structures (including detention/retention ponds and water quality vaults), as well as those privately-owned structures that have maintenance agreements with the City and were constructed after December 1, 2006. The inventory includes the structure ID, type, address, construction date and ownership (e.g. publicly owned, privately owned, and publicly owned by other entities that only includes those facilities that do not have their own NPDES permit and the permittee has the legal authority to inspect).
2. **Measurable goal(s):** Each reporting year, the inventory will be updated at least once to reflect when new structures are completed or existing structures are identified.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide a copy of the updated inventory including the number of structures added during the reporting period. The current inventory of stormwater management structures can be found in Appendix 5.2 – Stormwater BMP Inventory.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Chief Data Officer will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The effectiveness of this BMP will be gauged by the City's ability to quickly respond and take the necessary steps to ensure proper function of the post-construction structures.

MCM 5 – Post-Construction Stormwater Management

Best Management Practice #5.3 – Inspection Program

1. **Description of BMP:** The City will inspect all publicly and privately maintained post-construction stormwater management structures on the inventory list provided in BMP #5.2. Each inspection will be documented and if maintenance and/or repairs are needed, the owner will be notified.
2. **Measurable goal(s):** Within the 5-year permit term, 100% of the post-construction stormwater management structures on the inventory list provided in BMP #5.2 will be inspected. At a minimum, 5% of the structures will be inspected annually.
3. **Documentation to be submitted with each annual report:** Each reporting year, inspection reports of the post-construction stormwater management structures conducted during the reporting period will be provided in the annual report. The inspection checklist for post-construction stormwater management structures can be found in Appendix 5.3B – Inspection Form.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): on-going
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP in its ability to identify needs for repair and/or maintenance before they escalate into larger issues that would compromise water quality.

SWMP Attachments: Appendix 5.3A – Guidebook for Property Owners and HOAs, Appendix 5.3B – Inspection Form, Appendix 5.3C – Table for Tracking Inspections

MCM 5 – Post-Construction Stormwater Management

Best Management Practice 5.4 - Maintenance Program

1. **Description of BMP:** The City's operation and maintenance program for post-construction stormwater management structures covers those structures identified in the inventory list in BMP #5.2. The maintenance varies by the ownership of the structures (City-owned, owned by other public entities, and privately-owned). City-owned structures are maintained by the City. Work orders are issued based on maintenance and/or repair needs identified during inspection per BMP #5.3. Structures owned by other public entities and privately-owned structures are required to have maintenance agreements with the City. Copies of the maintenance agreements are retained by the City. If maintenance and/or repair needs are identified for structures owned by other public entities or private owners the City will provide notification to the owner(s).
2. **Measurable goal(s):** Each reporting year, the City will document 100% of maintenance and/or repairs conducted on City-owned structures. Each reporting year, the City will acquire maintenance agreements for any new structures added to the inventory list required by BMP #5.2 that are not owned by the City and provide a summary list of maintenance agreements.
3. **Documentation to be submitted with each annual report:** Each reporting year, for City-owned structures, the City will provide a list of the structures, the type of maintenance performed, and documentation of maintenance performed during the reporting period. For structures owned by other public entities and privately-owned structures, the City will provide a list and copies of any notifications sent to the owners related to needed maintenance and/or repairs needed. The City will provide a list of maintenance agreements and the total number of agreements. A copy of the stormwater facilities maintenance agreement can be found in Appendix 5.4A – Maintenance Agreement and a list of maintenance agreements can be found in Appendix 5.4B – List of Maintenance Agreements.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by the functioning of the City-owned stormwater management structures.

SWMP Attachments: Appendix 5.4A – Maintenance Agreement Documentation Form, Appendix 5.4B – Sample Maintenance Agreement, Appendix 5.4C – List of Maintenance Agreements, and Appendix 5.4D – Notification Form

MCM 5 – Post-Construction Stormwater Management

Best Management Practice #5.5 – GI / LID Structure Inventory

1. **Description of BMP:** The City maintains an inventory of water quality related Green Infrastructure/Low Impact Development (GI/LID) structures located within the City constructed after December 6, 2012. The inventory includes City-owned GI/LID structures, GI/LID structures owned by other public entities, and non-residential privately-owned GI/LID structures. The inventory includes the total number of each type of structure (bioswales, pervious pavement, rain gardens, cisterns, and green roofs).
2. **Measurable goal(s):** Each reporting year, the inventory will be updated at least once to reflect when new water quality related GI/LID structures (that are City-owned, owned by other public entities, and non-residential privately-owned structures) are added.
3. **Documentation to be submitted with each annual report:** Each reporting year, an up-to-date inventory list that includes the total number of each type of structure will be documented and submitted with the annual report. The GI / LID structures inventory can be found in Appendix 5.5 – Inventory of GI / LID.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Chief Data Officer, will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP by its ability to incorporate natural process into the built environment through the use of GI/LID structures.

SWMP Attachments: Appendix 5.5A – Inventory of GI / LID and Appendix 5.5B – GI / LID Map

MCM 5 – Post-Construction Stormwater Management

Best Management Practice #5.6 - GI / LID Program

1. **Description of BMP:** The City has a program describing its Green Infrastructure/Low Impact Development (GI / LID) practices. The GI / LID program includes the following:
 - a) Procedures for evaluating the feasibility and site applicability of different GI / LID techniques and practices to be considered;
 - b) GI / LID structures allowed to be constructed within the City; and
 - c) Procedures for the inspection and maintenance of the GI / LID structures, including city-owned structures, structures owned by other public entities, and non-residential privately-owned structures.
2. **Measurable goal(s):** The City will ensure that GI/LID is conforming to the program implemented by the City.
3. **Documentation to be submitted with each annual report:** A copy of the GI / LID program will be provided in annual reports. The GI / LID Program included in the annual report and any program revisions will be provided in subsequent years following.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): ongoing
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by the extent to which GI / LID practices are included in development and redevelopment projects following the adoption of the program.

SWMP Attachments: Appendix 5.6A – GI / LID Program, Appendix 5.6B – Runoff Reduction Alternative Form, and Appendix 5.6C Linear Transportation Feasibility

MCM 5 – Post-Construction Stormwater Management

Best Management Practice (BMP) #5.7 – GI / LID Inspection Program

1. **Description of BMP:** The City has developed a Green Infrastructure/Low Impact Development (GI / LID) Inspection Program to monitor the GI/LID structures to ensure they comply with regulation standards in the GI/LID Program described in BMP #5.6.
2. **Measurable goal(s):** Within a five-year period, 100% of the GI / LID inventory (described in BMP #5.5) will be inspected.
3. **Documentation to be submitted with each annual report:** Each reporting year, inspection reports of the GI / LID inventory inspected during the reporting period will be provided in the annual report.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): ongoing
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** By inspecting each facility on a routine basis, the City can help ensure that GI / LID structures are being maintained, functioning properly, and if any deficiencies are found, they can be addressed in a timely manner.

SWMP Attachments: Appendix 5.7A – Inspection Forms and Appendix 5.7B – GI / LID Tracking Form

MCM 5 – Post-Construction Stormwater Management

Best Management Practice (BMP) #5.8 – GI / LID Maintenance Program

1. **Description of BMP:** The City has developed a Green Infrastructure/Low Impact Development (GI/LID) Maintenance Program to ensure they comply with regulation standards in the GI/LID Program described in BMP #5.6.
2. **Measurable goal(s):** Within a five-year period, 100% of the GI / LID inventory (described in BMP #5.5) will be inspected. 100% of the City-owned structures will be maintained as necessary. 100% of owners of private structures will be notified of maintenance needs.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will report on the maintenance completed on City-owned GI / LID structures, the number of structures and percentage of the total structures maintained during the reporting period as well as a database management report of the type of maintenance performed (by structure) and documentation of the maintenance performed. For the privately-owned structures, the City will provide a list of these structures and copies of any notifications sent to the owners related to needed maintenance.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): ongoing
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** By regularly maintaining public GI/LID and ensuring private GI/LID is maintained, these systems will continue to reduce runoff volume as intended in the Post-Construction Stormwater Ordinance. Properly functioning and draining GI/LID practices will show the effectiveness of regular maintenance activity.

SWMP Attachments: Appendix 5.8A – GI / LID Maintenance Agreement, Appendix 5.8B – GI / LID Notification Form, and Appendix 5.8C – List of Maintenance Agreements

Pollution Prevention/Good Housekeeping for Municipal Operations

40 CFR Part 122.34(b)(6) Requirement: The permittee must 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 municipal operations. Using training materials available from the USEPA and other organizations as guidance, the permittee must, as a part of this program, include employee training 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.

MCM 6 - Pollution Prevention/Good Housekeeping

Best Management Practice #6.1 - MS4 Control Structure Inventory and Map

1. **Description of BMP:** The City maintains an up-to-date inventory and map that shows the location of City-owned MS4 control structures including catch basins, ditches/swales, detention/retention ponds, and storm drain lines.
2. **Measurable goal(s):** Each reporting year, the inventory and map will be updated at least once to reflect when new structures are completed or existing structures are identified.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide a copy of the updated inventory and map including the number of structures added during the reporting period and the total number of structures. The MS4 control structures and conveyances map can be found in Appendix 6.1A – Map of MS4, the inventory of MS4 conveyances can be found in Appendix 6.1B – Inventory of Conveyances, and the inventory of MS4 control structures can be found in Appendix 6.1C – Inventory of Control Structures.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Chief Data Officer will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The effectiveness of this BMP will be gauged by the City's ability to quickly respond and take the necessary steps to ensure proper function of the MS4 control structures.

SWMP Attachments: Appendix 6.1A – Map of MS4, Appendix 6.1B – Inventory of Conveyances, and Appendix 6.1C – Inventory of Control Structures

MCM 6 - Pollution Prevention/Good Housekeeping

Best Management Practice #6.2 - MS4 Inspection Program

1. **Description of BMP:** The City inspects all MS4 control structures on the inventory list provided in BMP #6.1. Each inspection is documented and results are uploaded into a data management system. Maintenance and/or repairs needs identified through the inspections are addressed through the City's MS4 Maintenance Program described in BMP #6.3.
2. **Measurable goal(s):** Within the 5-year permit term, 100% of the MS4 control structures on the inventory list provided in BMP #6.1 will be inspected. At a minimum, one inspection will be conducted each year.
3. **Documentation to be submitted with each annual report:** Each reporting year, the number and percentage of MS4 control structures inspected during the reporting period and a data management spreadsheet with inspection results will be provided in the annual report.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): on-going
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Stormwater Utility Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP in its ability to inspect facilities on a routine basis.

SWMP Attachments: Appendix 6.2A – Sample Inspection Form and Appendix 6.2B – Inspection Tracking Table

MCM 6 - Pollution Prevention/Good Housekeeping

Best Management Practice #6.3 - MS4 Maintenance Program

1. **Description of BMP:** The City's operation and maintenance program for MS4 control structures covers those structures identified in the inventory list required by BMP #6.1. The City will perform maintenance and repairs as funding allows. Work orders are issued based on maintenance and/or repair needs identified during inspections per BMP #6.2.
2. **Measurable goal(s):** Each reporting year, the City will document 100% of maintenance and/or repairs conducted on the MS4 control structures conducted during the reporting period.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide data management spreadsheets detailing the type of structures maintained and maintenance conducted during the reporting period.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Stormwater Utility Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by the functioning of the MS4 control structures.

SWMP Attachments: Appendix 6.3A – MS4 Asset Maintenance Procedures and
Appendix 6.3B - MS4 Assets Maintained Table

MCM 6 - Pollution Prevention/Good Housekeeping

Best Management Practice #6.4 - Street Cleaning

1. **Description of BMP:** The City conducts a street sweeping program to remove debris from the roadways. To complete the work, the City contracts for street sweeping utilizing a motorized street sweeper.
2. **Measurable goal(s):** Each reporting year, the City will sweep at least one mile of roadway.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will document the miles of roads swept and the date(s) the sweeping occurred. A copy of the street cleaning locations and documentation process is included in Appendix 6.4 – Street Sweeping Procedures.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Construction Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by the amount of litter and debris removed from the streets and thereby not entering the streams through MS4 control structures.

MCM 6 - Pollution Prevention/Good Housekeeping

Best Management Practice #6.5 - Employee Training

1. **Description of BMP:** Employees will be provided educational training on stormwater management and pollution prevention. Employee training will include topics such as good housekeeping at city-owned facilities, illicit discharge, construction site inspections, and/or green infrastructure.
2. **Measurable goal(s):** Each reporting year, the City will have at least one training for employees.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide sign-in sheets, training agendas, or similar materials to document the educational activities conducted during the reporting period.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP by evaluating the information retained by employees.

MCM 6 - Pollution Prevention/Good Housekeeping

Best Management Practice #6.6 - Waste Disposal

1. **Description of BMP:** Waste removed from the MS4 must be disposed of properly to effectively eliminate sources of pollution from our watershed. The City takes material removed from the MS4 to an active landfill for proper disposal.
2. **Measurable goal(s):** Each reporting year, the City will ensure 100% of waste removed from the MS4 will be taken to an active landfill for proper disposal.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide invoices detailing the disposal of the debris removed from MS4 control structures (cleaning and/or maintenance activities). The Waste Disposal Procedure can be found in Appendix 6.6 – Waste Disposal Procedure.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): on-going
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Construction Manager will be responsible.
6. **Rationale for choosing BMP and setting measurable goal(s):** The cleaning and removal of debris from the MS4 will reduce the amount of pollutants and trash entering the streams.
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP by the amount of waste removed from the MS4.

SWMP Attachments: Appendix 6.6A – Waste Disposal Procedure and Appendix 6.6B – Waste Disposal Tracking Form

MCM 6 - Pollution Prevention/Good Housekeeping

Best Management Practice #6.7 - New Flood Management Projects

1. **Description of BMP:** The City reviews proposed flood management projects (including detention and retention ponds) for water quality impacts during the design phase. In addition to adopted local ordinances, the City utilizes the Georgia Stormwater Management Manual as resource to aid in its reviews.
2. **Measurable goal(s):** The City will review 100% of submitted flood management projects (e.g. detention and retention ponds) for water quality impacts.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will document (and submit with the annual report) the number of flood management projects received and the number assessed for water quality impacts during the reporting period.
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): as needed
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Land Development Manager will be responsible.
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of this BMP by the number of approved plans that comply with the City's stormwater management ordinances and the Georgia Stormwater Management Manual.

MCM 6 - Pollution Prevention/Good Housekeeping

Best Management Practice #6.8 - Existing Flood Management Projects

1. **Description of BMP:** The City will conduct assessments of City-owned existing flood management projects (detention and retention ponds) and assess them for potential retrofitting to address water quality impacts. This will include a site-specific analysis of the current design, a review of the potential runoff reduction or water quality best management practices in accordance with the Georgia Stormwater Management Manual, and analysis of the footprint and surrounding land of the existing pond to determine the feasibility of retrofitting the pond to improve water quality. The inventory of existing city-owned ponds can be found in Appendix 6.1C.
2. **Measurable goal(s):** Each reporting year, the City will assess at least one structure. Over the five-year plan the City will assess at least five of its structures.
3. **Documentation to be submitted with each annual report:** Each reporting year, the City will provide a summary of the flood management project(s) assessed, retrofitting activities recommended for the project(s), and any retrofitting activities completed on existing project(s).
4. **Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
5. **Person (position) responsible for overall management and implementation of the BMP:** The City's Stormwater Utility Manager will be responsible.
6. **Rationale for choosing BMP and setting measurable goal(s):** By evaluating existing detention and retention ponds the City can assess the need for expansion or improvement to existing structures to enhance water quality and channel protection.
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by the number of assessments completed within the 5-year period.

MCM 6 - Pollution Prevention/Good Housekeeping

Best Management Practice #6.9 - Municipal Facilities

- 1. Description of BMP:** The City maintains an up-to-date inventory that lists the location of City-owned municipal facilities with the potential to cause pollution. The City conducts inspections on municipal facilities listed in the inventory.
- 2. Measurable goal(s):** Each reporting year, the inventory of municipal facilities will be updated at least once to reflect when new structures are completed or existing structures are identified. Within the 5-year permit term, 100% of the municipal facilities on the inventory list will be inspected. The City will conduct inspections on a minimum of 5% of the facilities each year.
- 3. Documentation to be submitted with each annual report:** Each reporting year, the City will provide a copy of the updated inventory including the number of structures added during the reporting year, the number and percentage of municipal facilities inspected during the reporting year, and the completed inspection forms from the inspections completed during the reporting year. The inventory of municipal facilities can be found in Appendix 6.9A – Municipal Facilities Inventory and the inspection checklist can be found in Appendix 6.9B – Inspection Form.
- 4. Schedule:**
 - a. Interim milestone dates (if applicable): n/a
 - b. Implementation date (if applicable): on-going
 - c. Frequency of actions (if applicable): annually
 - d. Month/Year of each action (if applicable): n/a
- 5. Person (position) responsible for overall management and implementation of the BMP:** The City's Chief Data Officer will be responsible for the inventory and map. The City's Land Development Manager will be responsible for inspections.
- 6. Rationale for choosing BMP and setting measurable goal(s):** Inspecting the City's municipal facilities will ensure the facilities are not contributing to the pollution of the streams.
- 7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The City will gauge the effectiveness of the BMP by the percentage of municipal facilities inspected over the 5-year permit term.

SWMP Attachments: Appendix 6.9A – Municipal Facilities Inventory, Appendix 6.9B – Inspection Form (for municipal facilities), Appendix 6.9C – Map of Municipal Facilities, and Appendix 6.9D – Inspections Tracking Form

Enforcement Response Plan

The City has developed and implemented an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Storm Water Management Program.

Date of submittal to EPD: August 3, 2018

In accordance with Part 4.3 of the NPDES Permit, the ERP includes escalating enforcement responses for repeat and continuing violations and addresses the following categories:

- Names of ordinances and citations;
- Types of enforcement mechanisms;
- Description of the use of these enforcement mechanisms;
- Time frames; and
- Description of the tracking and reporting mechanism.

The Enforcement Response Plan can be found in Appendix 7 – ERP.

The City will review the ERP annually and revise as needed. If revised during the reporting period, the City will submit the updated ERP to the EPD for review.

Impaired Waters

The City has developed and implemented an Impaired Waters: Monitoring and Implementation Plan (IWP) that describes the action to be taken related to the monitoring of the City's impaired waters.

Date of submittal to EPD: June 4, 2023

The City's IWP includes the following:

- A list of impaired waters and the pollutant(s) of concern
- Sample location, sample type, frequency, and seasonal considerations
- Implementation schedule for monitoring each pollutant of concern
- A map showing the location of the impaired waters and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters or a schedule for confirming those outfalls; and
- Description of proposed BMPs.
- Description of the method used to annually assess data trends for each pollutant of concern.

The Impaired Waters: Monitoring and Implementation Plan is attached in Appendix 8 – IWP.

Each reporting year, the City will review the latest approved 305(b) / 303(d) List of Waters and revise as needed. If revised during the reporting period, the City will submit the updated IWP to the EPD for review.

Each reporting year, the City will include any monitoring data collected during the reporting period, an assessment of the data trends over time for each pollutant of concern, and an assessment to determine the effectiveness of the BMPs employed. If BMP revisions and/or additional BMPs are necessary, then the revised IWP will be submitted to EPD for review.