City of Senoia, Georgia

Stormwater Management Plan (SWMP)

National Pollutant Discharge & Elimination System (NPDES) Phase II
Municipal Separate Storm Sewer System (MS4) Permit (Effective December 6, 2017)

Submitted to:
Environmental Protection Division
Georgia Department of Natural Resources

June 4, 2018, Revised October 11, 2019

City of Senoia
80 Main Street
Senoia, GA 30276
www.senoia.com

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APPENDICIES

RESPONSIBLE PARTY AND PLAN CERTIFICATION

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Sharing Responsibility

The City of Senoia does not share responsibility with any other entity for implementation of the Best Management Practices outlined in this Plan.

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, 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: Harold Simmons **Title**: City Manager

Signature: _____ **Date**: 10/17/19

ACRONYMS

BMPs	Best Management Practices
CIP	Capital Improvement Project
City	City of Senoia
CWA	Clean Water Act
E&S	Erosion & Sedimentation
EOC	Emergency Operations Center
EPD	Georgia Environmental Protection Division
ERP	Enforcement Response Plan
ESPC	Erosion, Sedimentation & Pollution Control
GESA	Georgia Erosion & Sedimentation Act
GIS	Geographic Information System
GSMM	Georgia Stormwater Management Manual
GSWCC	Georgia Soil & Water Conservation Commission
IDDE	Illicit Discharge Detection & Elimination
LAS	Land Application System
LDP	Land Disturbance Permit
LIA	Local Issuing Authority
MEP	Maximum Extent Practicable
MNGWPD	Metropolitan North Georgia Water Planning District
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge & Elimination System
POC	Pollution of Concern
QA/QC	Quality Assurance/Quality Control
ROW	Right of Way
SOP	Standard Operating Procedure
SWCD	Soil and Water Conservation District
SWMP	Stormwater Management Plan
TSS	Total Suspended Solids
WWTP	Wastewater Treatment Plant

DEFINITIONS

The following definitions were established by the NPDES Phase II MS4 permit, signed on November 15, 2017, and are hereby included in the City of Senoia's SWMP.

Annual Report - the document submitted by the permittee on an annual basis summarizing the SWMP activities conducted during the previous reporting period.

Best Management Practice or BMP - both structural devices to store or treat stormwater runoff and non-structural programs or practices which are designed to prevent or reduce the pollution of the waters of the State of Georgia.

Construction Activity - the disturbance of soils associated with clearing, grading, excavating, filling of land, or other similar activities which may result in soil erosion.

Construction General Permits or CGPs - the Georgia NPDES Permit for Stormwater Discharges Associated with Construction Activity Nos. GARIO000l, GAR100002, and GAR100003, which identify the Manual for Erosion and Sediment Control in Georgia (Green Book) and stream buffer requirements.

Control Measure - any BMP or other method used to prevent or reduce the discharge of pollutants to the waters of the State of Georgia.

Clean Water Act or CWA - the Federal Clean Water Act (formerly known as the Federal Water Pollution Control Act or the Federal Water Pollution Control Act Amendments of 1972), as amended.

Director - the Director of the Environmental Protection Division of the Department of Natural Resources, State of Georgia.

Discharge - the discharge of a pollutant.

Discharge-related Activities - includes activities which cause, contribute to, or result in stormwater point source pollutant discharge; and measures to control stormwater discharges, including the siting, construction and operation of BMPs to control, reduce or prevent stormwater pollution.

EPA or USEPA- the United States Environmental Protection Agency.

EPD - the Environmental Protection Division of the Department of Natural Resources, State of Georgia.

Existing Permittee - a Phase II municipal separate storm sewer system designated by EPD for coverage under this permit prior to the issuance date of this permit.

Illicit Connection - any man-made conveyance connecting a non-stormwater discharge directly to a municipal separate storm sewer system.

Illicit Discharge - any direct or indirect non-stormwater discharge to a municipal separate storm sewer system, including, but not limited to, sewage, process wastewater, and washwater. The discharge may be continuous or intermittent in occurrence.

Linear Transportation Projects - construction projects on traveled ways including but not limited to roads, sidewalks, multi-use paths and trails, and airport runways and taxiways.

Maximum Extent Practicable - the controls necessary for the reduction of pollutants discharged from a municipal separate storm sewer system. These controls may consist of a combination of BMPs, control techniques, system design and engineering methods, and such other provisions for the reduction of pollutants discharged from an MS4 as described in the SWMP.

Municipal Separate Storm Sewer System or MS4 - a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels or storm drains, owned or operated by a municipality or other public body, designed or used for collecting or conveying stormwater runoff and is not a combined sewer or part of a Publicly Owned Treatment Works.

National Pollutant Discharge Elimination System or NPDES - the program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits and imposing and enforcing pretreatment requirements under Sections 307, 402, 318, and 405 of the Clean Water Act.

New Development - land disturbing activities, structural development (construction, installation or expansion of a building or other structure), and/or creation of impervious surfaces on a previously undeveloped site.

New Permittee - a Phase II MS4 designated by EPD for coverage under this permit based on the 2020 or subsequent decennial U.S. Census, or based on other State designation criteria.

Notice of Intent or NOI - the mechanism used to register for coverage under this general permit.

Outfall - the most downstream point (i.e. final discharge point) on an MS4 where it discharges to receiving waters of the State.

Owner or Operator - the owner or operator of any MS4 or any activity subject to regulation under the NPDES program.

Permitted Area - the area of a City or County that is covered by this General NPDES Stormwater Permit. For a City, it refers to the entire City limits; for a County, it refers only to that part of the County contained within an "Urbanized Area" as defined by the latest Decennial Census by the Bureau of the Census.

Point Source - any discernible, confined and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged into the waters of the State of Georgia. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

Pollutant - dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials

(except those regulated under the Atomic Energy Act of 1954, as amended), heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal and agricultural waste discharged into water.

POTW - Publicly Owned Treatment Works.

Redevelopment - the structural development (construction, installation or expansion of a building or other structure), creation or addition of impervious surfaces, replacement of impervious surface not part of routine maintenance, and land disturbing activities associated with structural or impervious development. Redevelopment does not include such activities as exterior remodeling.

Small MS4 (defined in 40 CFR Part 122.26(6)(16)) - all separate storm sewers that are owned or operated by the United States, the State of Georgia, city, town, borough, county, parish, district, association, or other public body (either created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity or a designated and approved management agency under Section 208 of the CWA that discharges to the waters of the State of Georgia but is not defined as a "large" or "medium" MS4. This term includes systems similar to municipal MS4s, such as systems at military bases, large hospitals, universities, prison complexes, and highways and other thoroughfares. This definition does not include separate storm sewers in very discrete areas, such as individual buildings.

State Act - the Georgia Water Quality Control Act, as amended.

State Rules or Rules - the Georgia Rules and Regulations for Water Quality Control.

Stormwater - stormwater runoff, snow melt runoff, and surface runoff and drainage.

SWMP or Program - the Stormwater Management Program required to be developed and implemented under the terms and conditions of this permit and refers to a comprehensive program to manage the quality of stormwater discharged from a MS4.

Waters of the State - any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, wetlands, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the State which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation.

EXECUTIVE SUMMARY

The City of Senoia (City) has secured coverage under the National Pollutant Discharge and Elimination System (NPDES) Phase II Municipal Separate Storm Sewer System (MS4) Permit dated November 15, 2017. The City was officially designated by the Georgia Environmental Protection (EPD) in their letter dated March 7, 2014, and therefore must comply as required by provisions of the Georgia Water Quality Control Act and the Federal Clean Water Act (CWA). This permit requires the development of a Stormwater Management Plan (SWMP), to address the following provisions:

- Public Education
- Public Involvement
- Illicit Discharge Detection and Elimination
- Erosion & Sedimentation Control
- Post Construction Stormwater Management Control
- Good Housekeeping

Please note that Senoia's population is less than 10,000 people so only certain requirements apply. Also, the City of Senoia is located within the Metropolitan North Georgia Water Planning District (MNGWPD), and is therefore subject to the various requirements of the District.

LOCAL WATERWAYS TO WHICH THE MS4 DISCHARGES

The City of Senoia MS4 discharges into the Upper Flint Watershed. The major waterways draining the City include Keg Creek and a tributary to Dead Oak Creek. Line Creek runs along the north and east boundaries of the City. Keg Creek extends from northwest to southeast bisecting the City before meeting up with Line Creek in unincorporated Coweta County near the border of Fayette County. Both Keg Creek and Line Creek discharge to the Flint River.

Table 1 summarizes the 303(d) listed streams and the pollutant of concern (POC) located within the City limits as per the 303(d) list for 2016. As noted above, Line Creek runs along the City's northeastern boundary; however, the City does not currently have any MS4 outfalls that discharge to these listed segments.

Table 1: Streams within the City listed on the Georgia 303(d) List for 2012

Reach	County	Location	Extent (miles)	Pollutant of Concern	TMDL Approved	Source
Line Creek (RR031300050206)	Fayette	Line Creek WPCP to Flat Creek	2.75	Fecal Coliform (FC)	No	Non-Point Source (NP)
Line Creek (RO31300050209)	Coweta Fayette Spalding	Flat Creek to Flint River	15.5	Fecal Coliform (FC)	Yes	Non-Point Source (NP)

DRAINAGE SYSTEM - LEGAL SUMMARY

The drainage system within the City of Senoia consists of natural and/or man-made structures, within the political boundaries of the city which channel or convey storm water from its point of collection to a point of discharge. The City, owns or has legal access to certain segments of this system which (1) are located within public streets and street rights-of-way owned or controlled by the City; (2) are subject to written easements, rights-of-entry, rights-of-access, rights-of-use, or other legal provisions for adequate access for operation, maintenance, and/or improvement of such systems and facilities; or (3) are located on public lands owned by the City or to which the City has been granted adequate access by the public owner for operation, maintenance, and/or improvement of such systems and facilities. Operation and maintenance of storm water systems and facilities which are located on private property for which there has been no public dedication of such systems and facilities for operation, maintenance, and/or improvement of the systems and facilities by the City, or public property not owned or controlled by the City of Senoia, shall be and remain the legal responsibility of the property owner, except as that responsibility may be otherwise affected by the laws of the United States of America, the State of Georgia, and this Permit.

As defined for purposes of this Permit, the MS4 owned and operated by the City of Senoia may entail a more expansive system than that of the drainage system alone in order to recognize the City's evolving role as a regulator under a comprehensive management program designed to reduce pollutants flowing into our Federal and State waters to the maximum extent practicable, through public awareness and education, local permitting, inspection, and enforcement.

A. PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS

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

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.1(a) of the NPDES Phase II MS4 permit.

A.1. BMP: STORMWATER EDUCATION MATERIALS

Permit Section: 4.2.1(a)1

A.1.1. Description of BMP

The City of Senoia will maintain a display of stormwater management and water resources related informational materials (i.e. brochures, pamphlets, etc) at City Hall and refill the display on a regular basis. These brochures will address the following topics:

- Stormwater Pollution Prevention
- Public Education and Awareness
- Fats, Oils, and Grease (FOG) Management

A.1.2. Measurable Goal(s):

a. Review brochures on an annual basis.
b. Display 25 brochures and restock as they run out.

A.1.3. Documentation to be included in each annual report:

a. Copies of any brochures distributed during the reporting period.
b. Record log of distributed brochures during the year.

A.1.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Update educational materials at least once per year
d. *Month/Year of Each Action:* 2018 - 2022

A.1.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

A.1.6. Rationale for choosing BMP and setting measurable goal(s):

The BMP provides information to the general public on stormwater management related issues. Furthermore, because this information is updated annually, the City can keep the public up-to-date on new and developing issues related to stormwater management and water resources issues.

A.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

As this educational material is continuously distributed within the community, the general public will become better educated on stormwater management issues and reduce their impacts on local waterways.

A.2. BMP: STORMWATER WEBPAGE

Permit Section: 4.2.1(a)1

A.2.1. Description of BMP

The City has a multi-functional website that will contain information for the general public, businesses, and industries related to stormwater management. The website can be found at http://www.senoia.com. The City has developed a webpage that includes general information on stormwater management, as well as more specific information including:

- Stormwater Pollution Prevention
- Water Quality
- Instructions on how to report stormwater problems and illicit discharges
- The City's NPDES Phase II MS4 Permit and Annual Report

The City will continue to monitor and update the information on this website on at least an annual basis. The City will add a "counter" to the website so that it can determine how many visits or "hits" there have been for the stormwater webpage. The City will also advertise the website on the City's utility bill and on other educational materials. This webpage is located at the following web address: https://senoia.com/water/page/storm-water-management.

A.2.2. Measurable Goal(s):

a. The City will review and update the information on the website once per year.
b. Update the stormwater website to include a counter to record the number of visits by 2021.

A.2.3. Documentation to be submitted with each annual report:

a. A copy of new materials/information posted on website.
b. Reporting number of website visits once implemented.

A.2.4. Schedule:

a. *Interim Milestone Dates:* Addition of website counter by 2021.
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Update website once per year and advertise the website information to the general public once per year via monthly customer utility bills.
d. *Month/Year of Each Action:* 2018 - 2022

A.2.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

A.2.6. Rationale for choosing BMP and setting measurable goal(s):

The BMP provides information to the public on stormwater management related issues in a format that they are more likely to view, i.e. the City website. Furthermore, because this information will be updated periodically, the City can keep the general public up-to-date on new and developing issues related to stormwater management.

A.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

As this educational material is continuously distributed within the community, the general public will become better educated on stormwater management issues and reduce their impacts on local waterways.

B. PUBLIC INVOLVEMENT / PARTICIPATION

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

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.2(a) of the NPDES Phase II MS4 permit.

B.1. BMP: CITIZEN COMPLAINT HOTLINE/WEBPAGE

Permit Section: 4.2.2(a)1

B.1.1. Description of BMP

The City has established procedures for receiving, investigating, and tracking complaints. Complaints can be made by calling the City Hall Complaint Line at (770) 599-3679. The City will encourage citizens to look for and report illicit discharges and illegal dumping via this phone number and website. The City will advertise the hotline and website on the utility bill, and on educational materials developed and displayed at City Hall. All citizen complaints will be documented by City staff and then directed to the appropriate department for follow up within three (3) business days. All complaints received, the City's response, records of any investigation activities performed, and enforcement actions undertaken will be recorded in the City's Stormwater Complaint Database.

B.1.2. Measurable Goal(s):

a. Advertise the opportunity for citizens to report illicit discharges each year via the utility bill and educational materials.
b. Record illicit discharge complaints in the Stormwater Complaint Database.
c. Investigate 100% of all water quality complaints within three (3) business days.
d. Take appropriate action for 100% of complaints requiring action.

B.1.3. Documentation to be submitted with each annual report:

a. A summary from the Stormwater Complaint Database, including all illicit discharge complaints and actions taken in the reporting period.
b. Copies of any materials promoting the Citizen Hotline/website.

B.1.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date:* 2018
c. *Frequency of Actions:* Annual advertisement of hotline/website.
d. *Month/Year of Each Action:* 2018 - 2022

B.1.5. Person (position) responsible for overall management and implementation of the BMP: City Manager

B.1.6. Rationale for choosing BMP and setting measurable goal(s):

To promote opportunities for the general public to get involved and report stormwater pollution incidents to the City for proper follow up, inspection and enforcement should help to reduce the frequency and significance of stormwater pollution incidents within the community.

B.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The ability of residents to report complaints will increase the City's knowledge of these incidents. Investigation of the incidents should result in a larger number of these issues getting resolved by the City and therefore less pollutants being discharged into local streams and creeks.

B.2. BMP: ANNUAL CITYWIDE CLEAN UP EVENT

Permit Section: 4.2.2(a)1

B.2.1. Description of BMP

The City holds a citywide cleanup event in the Spring season each year that includes debris/trash removal that would otherwise end up in the city's waterways (i.e. streams, creeks, etc). Trash and debris removed from the cleanup will be collected and an estimate will be made of the amount collected. The City advertises this event to the public through its website and other outreach avenues. The City will maintain records of the number of volunteers that participated as well as the amount of the debris collected through the cleanup.

B.2.2. Measurable Goal(s):

a. Hold one clean up event per year.

B.2.3. Documentation to be submitted with each annual report:

a. Records of the number of volunteers that participated (sign-in sheets, etc.).
b. Estimate of the gross weight of trash collected.

B.2.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* Spring 2015 (actual date TBD)
c. *Frequency of Actions:* One clean up per year
d. *Month/Year of Each Action:* 2018 - 2022

B.2.5. Person (position) responsible for overall management and implementation of the BMP:

City Manager

B.2.6. Rationale for choosing BMP and setting measurable goal(s):

Urban streams are often an unnoticed natural resource feature that only seems to garner the public's attention when flooding occurs or when a significant pollution event occurs. The objective of having a cleanup program is to facilitate public participation in the protection of urban streams such that people better understand their crucial role in local stormwater management. The intent is that people's participation in the cleanup will result in improved stream health as well as stream functionality. Once people interact more with these natural resource features, people will better understand how their behavior impacts local streams and creeks.

B.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will be able to keep records of the amount of trash removed. This is a direct measurement of the effectiveness of this BMP in removing trash, debris and pollution from the streams and creeks.

C. ILLICIT DISCHARGE DETECTION AND ELIMINATION

40 CFR Part 122.34(b)(3) Requirement: You 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-stormwater discharges into your storm sewer system and implement appropriate enforcement procedures and actions;

C) Develop and implement a plan to detect and address non-stormwater 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.

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.3(a) of the NPDES Phase II MS4 permit.

C.1. BMP: LEGAL AUTHORITY

Permit Section: 4.2.3(a)1.a

C.1.1. Description of BMP

The City adopted the Model Illicit Discharge and Illegal Connection Ordinance of the MNGWPD on April 2, 2006. This existing ordinance prohibits non-stormwater discharges into the storm sewer system and establishes appropriate enforcement procedures associated with the City's Illicit Discharge Detection & Elimination (IDDE) Program.

C.1.2. Measurable Goal(s):

a. Enforce 100% of violations of the Illicit Discharge ordinance.
b. Annually evaluate the Illicit Discharge and Illegal Connection Ordinance to determine if revisions are required.

C.1.3. Documentation to be submitted with each annual report: If the ordinance is revised during the reporting period, a copy of the revised ordinance will be submitted to the Georgia EPD.

C.1.4. Schedule:

a. *Interim Milestone Dates:* n/a.
b. *Implementation Date:* 2014
c. *Frequency of Actions:* As violations are identified
d. *Month/Year of Each Action:* 2018 – 2022.

C.1.5. Person (position) responsible for overall management and implementation of the BMP: City Manager

C.1.6. Rationale for choosing BMP and setting measurable goal(s):

The City adopted the MNGWPD Model IDDE ordinance on April 2, 2006. A copy of the City's adopted IDDE Program Ordinance is attached in Appendix A.

C.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain the records of the number and types of illicit discharges identified and eliminated through enforcement of this ordinance.

C.2. BMP: OUTFALL MAP AND INVENTORY

Permit Section: 4.2.3(a)2.a/b

C.2.1. Description of BMP

The NPDES Phase II MS4 permit defines an "MS4 Outfall" to be *"the most downstream point (i.e. final discharge point) on an MS4 where it discharges to waters of the State."* The City maintains an inventory of MS4 Outfalls that discharge from the City MS4 to waters of the State. The City will add new MS4 Outfalls to this inventory as they are identified and/or accepted by the City.

C.2.2. Measurable Goal(s):

a. The City will provide an updated inventory and map of MS4 outfalls, including those MS4 outfalls added or identified during each reporting period in the Annual Report.

C.2.3. Documentation to be submitted with each annual report:

a. The City will provide an updated inventory map of all MS4 outfalls in each Annual Report.

C.2.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Update the citywide MS4 outfall inventory each year as new outfalls are added and/or deleted from the citywide inventory.
d. *Month/Year of Each Action:* 2018 - 2022

C.2.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

C.2.6. Rationale for choosing BMP and setting measurable goal(s):

The City needs an accurate inventory of its MS4 outfalls to implement dry weather screening activities and its IDDE program. Ensuring that outfalls screened are actual MS4 outfalls will make the most efficient use of City resources.

C.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain the records of the following: (1) the number of illicit discharges identified; (2) the types of illicit discharges identified; (3) the actions taken by the City when an illicit discharge is identified; and (4) the ultimate outcome that resulted from the illicit discharge including whether or not the illicit discharge was eliminated through implementation of the source tracing program or whether or not the illicit discharge could not be accurately traced.

C.3. BMP: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PLAN

Permit Section: 4.2.3(a)3.a/b/c

C.3.1. Description of BMP

The City will perform dry weather screening (DWS) of 100% of its MS4 outfalls within this 5-year permit cycle, and will screen no less than 5% of MS4 outfalls in any given year. Outfalls will be screened utilizing the EPD approved IDDE Plan and the associated "Dry Weather Screening Checklist", which are included in Appendix C. The City will investigate any potential illicit discharges in accordance with the EPD approved IDDE Plan. Should the City positively identify any illicit discharges, the City will conduct source tracing activities and enforce the provisions of its Illicit Discharge and Illegal Connection Ordinance for 100% of positively identified illicit discharges.

The City has developed an IDDE Plan, included in Appendix C, to formalize the City's procedures for dry weather screening of outfalls, the procedures for investigating potential illicit discharges via source tracing activities, and the procedures for enforcement of the Illicit Discharge and Illegal Connection Ordinance.

C.3.2. Measurable Goal(s):

a. Dry weather screen 100% of MS4 outfalls before the end of the existing permit cycle which extends through 2022.
b. Dry weather screen one zone or at least 5% pf MS4 outfalls each year.
c. Investigate and perform source tracing for 100% of all suspected illicit discharges.
d. Enforce the Illicit Discharge and Illegal Connection Ordinance and the Enforcement Response Plan (ERP) for 100% of positively identified illicit discharges.

C.3.3. Documentation to be submitted with each annual report:

a. The checklists for the outfalls screened.
b. Records of any source tracing or enforcement activities conducted as a result of the dry weather screening activities.

C.3.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2015
c. *Frequency of Actions:* Dry weather screen MS4 outfalls annually
d. *Month/Year of Each Action:* 2018 - 2022

C.3.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director and Code Enforcement Officer

C.3.6. Rationale for choosing BMP and setting measurable goal(s):

Dry weather screening data is useful in identifying potential illicit discharges and the possible sources of those illicit discharges. Appropriate corrective and enforcement actions will be undertaken if an illicit discharge is detected through the dry weather screening activities.

C.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain records of the number and types of illicit discharges identified, investigated and eliminated through implementation of this BMP. If the IDDE Program is being implemented in accordance with the MS4 permit then the City should be taking the necessary steps to identify and remove illicit discharges within the City's MS4.

C.4. BMP: ILLICIT DISCHARGE EDUCATION

Permit Section: 4.2.3(a)4.a

C.4.1. Description of BMP

The City will disseminate educational information to the general public regarding illicit discharges. The purpose of this BMP will be to inform the general public of the issue of "stormwater pollution" and how to prevent it in the household and/or the workplace. The City will include educational information on stormwater pollution prevention on the City's webpage https://senoia.com/water/page/storm-water-management in the section dedicated to stormwater management education. Educational information on the webpage will encourage the general public to report suspected illicit discharges, illegal dumping and/or stormwater pollution. The website will include a contact phone number to utilize in reporting these type incidents as well as an electronic link to submit a complaint. This BMP is closely related to the Public Education BMP A.2 and IDDE BMP C.

C.4.2. Measurable Goal(s):

a. Update the City's webpage on at least an annual basis with educational information and materials related to illicit discharge, illegal dumping and stormwater pollution prevention.

C.4.3. Documentation to be included with each annual report: Copies of information posted on the webpage and handed out regarding illicit discharges, illegal dumping and stormwater pollution prevention will be included in the Annual Report.

C.4.4. Schedule:

a. *Interim Milestone Dates:* N/A.
b. *Implementation Date:* 2015
c. *Frequency of Actions:* Annually
d. *Month/Year of Each Action:* 2018 - 2022

C.4.5. Person (position) responsible for overall management and implementation of the BMP: Community Development Director

C.4.6. Rationale for choosing BMP and setting measurable goal(s):

A program that raises public awareness regarding the negative impacts associated stormwater pollution as well as illicit discharges and illegal dumping into local streams should encourage the correct behavior from the general public and thereby reduce the frequency of these type incidents.

C.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

By educating the public about illicit discharges and encouraging them to report any illicit discharges, the City will be better able to remove and reduce the number of illicit discharges to the MS4.

C.5. BMP: COMPLAINT RESPONSE

Permit Section: 4.2.3(b)5.a

C.5.1. Description of BMP

The City has established procedures for receiving, investigating, and tracking complaints. Complaints can be made by calling the City Hall Complaint Line at (770) 599-3679. The City will encourage citizens to look for and report illicit discharges and illegal dumping via this phone number and website. The City will advertise the hotline and website on the utility bill, and on educational materials developed and displayed at City Hall. All citizen complaints will be documented by City staff and then directed to the appropriate department for follow up within three (3) business days. All complaints received, the City's response, records of any investigation activities performed, and enforcement actions undertaken will be recorded in the City's Stormwater Complaint Database.

C.5.2. Measurable Goal(s):

a. Investigate illicit discharge complaints within three (3) business days.
b. Record illicit discharge complaints in the Stormwater Complaint Database.

C.5.3. Documentation to be submitted with each annual report:

a. A summary from the Stormwater Complaint Database, including all illicit discharge complaints and actions taken in the reporting period.
b. Copies of any materials promoting the Citizen Hotline/website.

C.5.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date:* 2014
c. *Frequency of Actions:* As complaints are received.
d. *Month/Year of Each Action:* 2018 - 2022

C.5.5. Person (position) responsible for overall management and implementation of the BMP:

Code Enforcement Officer

C.5.6. Rationale for choosing BMP and setting measurable goal(s):

The ability of the general public to report stormwater pollution incidents to the City for proper follow up, inspection and enforcement should help to reduce the frequency and significance of stormwater pollution incidents within the community.

C.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The ability of residents to report complaints will increase the City's knowledge of these incidents. Investigation of the incidents should result in a larger number of these issues getting resolved by the City and therefore less pollutants being discharged into local streams and creeks.

D. CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

40 CFR Part 122.34(b)(4) Requirement: You must develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. Your 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.

NOTE: The City of Senoia currently is **not** a Local Issuing Authority (LIA) for Land Disturbance Activity (LDA) Permits as defined by the Georgia Erosion and Sedimentation Act (GESA). The Georgia EPD has determined that those local governments that do not have issuing authority for LDA Permits are not required to implement requirements of the Construction Site Stormwater Runoff Control Minimum Control Measure (MCM). In Senoia, the EPD and its staff are responsible for regulating, permitting, and enforcing State law for LDA Permits and the associated E&S requirements.

D.1. BMP: LEGAL AUTHORITY

Permit Section: 4.2.4(a)1

D.1.1. Description of BMP

Senoia is currently not a Local Issuing Authority (LIA) for LDA Permits as defined by the GESA. The EPD has determined that those local governments that do not have issuing authority for LDA Permits are not required to implement requirements of 122.26(d)(2)(iv)(D) that require construction site structural and non-structural programs. In these locations, EPD is responsible for regulating, permitting, and enforcing the Georgia Erosion and Sedimentation Act (GESA) for land disturbing activities.

However, the City adopted a NPDES Phase II MS4 Permit compliant Erosion and Sedimentation Control Ordinance on December 15, 2014 to provide the necessary authority to the City staff to enforce applicable provisions of the GESA, when necessary. The City's E&S Ordinance specifically includes an escalating series of enforcement mechanisms available to the City staff, which are outlined in the City's Enforcement Response Plan (ERP).

If Senoia does apply for the LIA status, programs will be added to the SWMP to address the following requirements:

- Site Plan Review Procedures
- Construction Site Inspection Program
- Construction Site Enforcement Procedures
- Construction Site Certification / Operator Educational and Training Activities

The City also adopted a Littler Ordinance on October 2, 2017 that specifically requires construction site operator to control wastes that could potentially impact water quality. Both ordinances are included Appendix A of this plan.

D.1.2. Measurable Goal(s):

a. Annually evaluate the Erosion and Sedimentation Control Ordinance to determine if revisions are required.

D.1.3. Documentation to be submitted with each annual report

If changes are made to the ordinance during a reporting period, a copy of the new ordinance will be included in the subsequent Annual Report.

D.1.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date:* 2014
c. *Frequency of Actions:* As needed
d. *Month/Year of Each Action:* 2018 - 2022

D.1.5. Person (position) responsible for overall management and implementation of the BMP: Community Development Director

D.1.6. Rationale for choosing BMP and setting measurable goal(s):

This ordinance is required to enable City staff to enforce the Erosion and Sedimentation Control Ordinance as needed to comply the NPDES Phase II MS4 Permit.

D.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain the records of the number and types of E&S violations investigated and the number of sediment discharges eliminated through implementation of the ordinance.

D.2. BMP: SITE PLAN REVIEW

Permit Section: 4.2.4(a)2

D.2.1. Description of BMP

The EPD and NRCS are responsible for reviewing all ES&PC plans for qualifying land development projects. ES&PC plans will be reviewed by the EPD and NRCS for compliance with the Manual for Erosion and Sedimentation Control in Georgia "Green Book".

D.2.2. Measurable Goal(s):

a. All qualifying developments within Senoia will have their ES&PC plans reviewed by EPD and NRCS.

D.2.3. Documentation to be submitted with each annual report

A list of the development projects that had ES&PC plans approved by NRCS and EPD recorded in the reporting period.

D.2.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2014
c. *Frequency of Actions:* As ES&PC Plans are submitted
d. *Month/Year of Each Action:* 2018 - 2022

D.2.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

D.2.6. Rationale for choosing BMP and setting measurable goal(s):

The City is not an Issuing Authority, therefore they do not review and approve ES&PC Plans in conjunction with a proposed land development project. ES&PC plan review and approval is the responsibility of the EPD.

D.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

This BMP ensures that the applicant properly prepares and secures approval of an ES&PC Plan, and that the applicant implements an approved ES&PC Plan to prevent sediment from leaving the construction site. State law mandates that discharges from developing sites cannot increase the Total Suspended Solids (TSS) in the receiving stream by more than 25 Nephelometric Turbidity Units (NTUs) so implementation of the approved ES&PC Plan should assist in meeting this standard.

D.3. BMP: EROSION & SEDIMENTATION (E&S) INSPECTIONS

Permit Section: 4.2.4(a)3

D.3.1. Description of BMP

The EPD will conduct inspections of construction sites and enforce E&S requirements. All qualified projects with an active NPDES Construction Permits will be periodically inspected for compliance with the Georgia Erosion and Sedimentation Control Act and in general accordance with GESA and the City's E&S Ordinance by EPD staff.

D.3.2. Measurable Goal(s):

a. 100% of active development sites with ongoing land disturbance activities will be periodically inspected by EPD staff.

D.3.3. Documentation to be submitted in each annual report:

A list of active construction sites recorded in the reporting period.

D.3.4. Schedule:

a. *Interim Milestone Dates*: N/A
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Ongoing
d. *Month/Year of Each Action:* 2018 - 2022

D.3.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

D.3.6. Rationale for choosing BMP and setting measurable goal(s):

E&S inspections and enforcement of the ordinance will prevent excessive erosion and sedimentation from construction activities.

D.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

This BMP ensures that developers implement approved ES&PC Plans to prevent sediment from leaving construction sites. State law mandates that discharges from land development sites cannot increase the TSS in the receiving stream by more than 25 NTUs so implementation of the approved ES&PC Plan combined with ongoing inspections by EPD and the City should achieve that water quality goal. The City will keep records of the number and observations of the E&S inspections conducted through implementation of this BMP.

D.4. BMP: ENFORCEMENT PROCEDURES FOR EROSION & SEDIMENTATION VIOLATIONS

Permit Section: 4.2.4(a)4

D.4.1. Description of BMP

The City will implement enforcement procedures for E&S violations documented at construction sites in accordance with the E&S Ordinance included in Appendix A and to supplement the enforcement efforts undertaken by the EPD, which is the primary enforcement entity. The City's E&S Ordinance specifically includes an escalating series of enforcement mechanisms available to the City staff, which are outlined in the City's Enforcement Response Plan (ERP) located in Appendix H.

D.4.2. Measurable Goal(s):

a. Enforcement will be taken on 100% of noted violations.

D.4.3. Documentation to be submitted with each annual report

Documentation of any enforcement actions taken during the reporting period.

D.4.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Ongoing
d. *Month/Year of Each Action:* 2018 - 2022

D.4.5. Person (position) responsible for overall management and implementation of the BMP:

Code Enforcement Officer

D.4.6. Rationale for choosing BMP and setting measurable goal(s):

Effective enforcement of the City's E&S Ordinance is necessary to ensure that the City properly regulates land disturbance activities that occur within the jurisdiction.

D.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain records of the number and nature of enforcement actions taken by the City in accordance with the ERP. Documentation regarding any enforcement actions undertaken will be submitted to EPD in the Annual Report each year.

D.5. BMP: CITIZEN COMPLAINT RESPONSE

Permit Section: 4.2.4(a)5

D.5.1. Description of BMP

The City will implement a program for receiving, investigating, and tracking the status of E&S complaints. Complaints can be made by calling the City Hall at (770) 599-3679. All citizen complaints will be documented by City staff and then directed to the appropriate City department (or EPD staff in the case of an E&S violation on an active construction site) for follow up. All complaints received, the City's response or referral of the violation to EPD, records of any investigation activities performed by the City, and enforcement actions undertaken by the City will be recorded in the City's database. The City's formal procedures for complaint response have been developed and are attached in Appendix C to this document

D.5.2. Measurable Goal(s):

a. Investigate E&S complaints within three (3) business days or refer them to the EPD for investigation where appropriate
b. Record complaints in the database

D.5.3. Documentation to be submitted with each annual report:

A copy of the complaint response database with all complaints and actions recorded in the reporting period.

D.5.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2014
c. *Frequency of Actions:* As complaints are received
d. *Month/Year of Each Action:* 2018 - 2022

D.5.5. Person (position) responsible for overall management and implementation of the BMP: Code Enforcement Officer

D.5.6. Rationale for choosing BMP and setting measurable goal(s):

E&S problems may be more easily identified and corrected by providing the public a way to report complaints.

D.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain records of the number and types of E&S complaints received and investigated through implementation of this BMP.

D.6. BMP: EMPLOYEE E&S CERTIFICATION

Permit Section: 4.2.4(a)6

D.6.1. Description of BMP

GESA now requires all local government employees involved with plan review, site inspections, or E&S Ordinance enforcement, as well as construction site operators to undergo the applicable training seminars developed by the GSWCC. The City requires construction site operators to maintain documentation on-site that they have received the appropriate certification.

D.6.2. Measurable Goal(s):

a. 100% of construction site operators will have applicable E&S certifications

D.6.3. Documentation to be submitted with each annual report

a. Copies of certification cards, printouts from the GSWCC, or copies of training certificates, etc.

D.6.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Ongoing
d. *Month/Year of Each Action:* 2018 - 2022

D.6.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director and Code Enforcement Officer

D.6.6. Rationale for choosing BMP and setting measurable goal(s):

By requiring certification for City employees and construction site operators, the City will ensure that ES&PC Plans are correctly designed and implemented on each active construction site.

D.6.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

This BMP ensures that E&S BMPs are installed correctly to prevent sediment from leaving construction sites. State law mandates that discharges from developing sites cannot increase the TSS in the receiving stream by more than 25 NTUs so implementation of the approved ESPC plan should help to achieve that water quality goal. The City will require that all personnel involved in E&S activities maintain their certifications and seek re-certification in accordance with the requirements of the GSWCC.

E. POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT & REDEVELOPMENT

<u>40 CFR Part 122.34(b)(5) Requirement</u>: You must develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your small MS4. 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.

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.5(a) of the NPDES Phase II MS4 permit.

E.1. BMP: LEGAL AUTHORITY

Permit Section: 4.2.5(a) 1.a

E.1.1. Description of BMP

The City previously adopted the MNGWPD's Model Post Construction Stormwater Management Ordinance and the Georgia Stormwater Management Manual (GSMM) on April 2, 2006. The ordinance and the GSMM outline the stormwater management plan requirements as well as the applicable design standards and criteria. New development or re-development projects that involve the creation of 5,000 square feet or more of impervious cover, or that involves other land development activities of one acre or more, must comply with the post-construction stormwater management requirements including removal of 80% of the average annual TSS load through treatment of the first 1.2" of rainfall.

The City will review and update its current Post Construction Stormwater Management Ordinance to ensure that its design criteria and performance standards are consistent with the latest version of the GSMM and the requirements of Section 4.2.5.1 of the permit by December 6, 2020.

E.1.2. Measurable Goal(s):

a. Annually review the City's Post Construction Stormwater Management Ordinance to determine if updates are needed.
b. Update the City's Post Construction Stormwater Management Ordinance to be consistent with the NPDES Phase II MS4 Permit and the GSMM.

E.1.3. Documentation to be submitted with each annual report: If changes are made to the ordinance during a reporting period, a copy of the new ordinance will be included in the subsequent Annual Report.

E.1.4. Schedule:

a. *Interim Milestone Dates:* Update ordinance by December 6, 2020
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Annually
d. *Month/Year of Each Action:* 2018 - 2022

E.1.5. Person (position) responsible for overall management and implementation of the BMP: City Attorney

E.1.6. Rationale for choosing BMP and setting measurable goal(s):

By reviewing and updating the Post Construction Stormwater Management Ordinance, the City will ensure that future development addresses stormwater quality in accordance with the most recent version of the GSMM as well as the most updated approaches to GI/LID design.

E.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain records for the number of stormwater management plans reviewed and approved in accordance with the ordinance and the GSMM. By requiring a "better site design" approach to stormwater management runoff control, the City will ensure that new

development and re-development projects comply with applicable post construction stormwater management requirements related to stormwater quality. Furthermore, the ordinance and GSMM require that all stormwater management site plans be designed to reduce Total Suspended Solids (TSS) by 80%.

E.2. BMP: STORMWATER FACILITY INVENTORY

Permit Section: 4.2.5(a)2.a/b

E.2.1. Description of BMP

The City maintains an inventory of stormwater facilities, i.e. detention/retention ponds, water quality vaults, etc., that are the operational responsibility of the City, or are the operational responsibility of the private owner, but were constructed after the City was designated a NPDES Phase II MS4 Permittee on March 7, 2014. The City will continue to maintain and update this inventory annually and include those updates in the Annual Report.

E.2.2. Measurable Goal(s):

a. The City will update the status of the inventory work each year in the Annual Report.

E.2.3. Documentation to be submitted with annual report:

a. An inventory list of stormwater facilities within the City.

E.2.4. Schedule:

a. *Interim Milestone Dates: N/A*
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Annual
d. *Month/Year of Each Action:* 2018 - 2022

E.2.5. Person (position) responsible for overall management and implementation of the BMP: Community Development Director

E.2.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP provides the information necessary for the City to implement the Stormwater Facility Inspection activity under BMP E.3 as outlined in the MS4 Permit.

E.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Development of an inventory of stormwater facilities will enable the City staff to implement the required inspection and maintenance activities to ensure that the ponds are operating properly as it relates to water quality treatment.

E.3. BMP: STORMWATER FACILITY INSPECTION PROGRAM

Permit Section: 4.2.5(a)3.a

E.3.1. Description of BMP

The City has developed the City of Senoia BMP Inspection Procedures (see Appendix D) which include inspection procedures for publicly owned and/or operated stormwater management facilities and those privately owned and operated facilities constructed after March 7, 2014. When inspections indicate a violation or problem with a private stormwater facility, the City will contact the owner and notify them of the maintenance needed per the procedures. If a "Detention Pond Inspection and Maintenance Agreement" is in place, the City will enforce the provisions of that agreement. If an agreement is not in place, the City will attempt to work with property owners in an effort to get them to perform the necessary maintenance. If inspections indicate a violation or problem with a publicly owned or maintained pond, the City will maintain the pond in accordance with the City of Senoia MS4 Inspection, Operation & Maintenance Procedures in Appendix E, which include guidance on stormwater facility maintenance, and the GSMM.

E.3.2. Measurable Goal(s):

a. Inspect 100% of public stormwater facilities every five years, with a minimum of 5% of public facilities being inspected each year.
b. Inspect 100% of the private stormwater facilities constructed after March 7, 2014 every five years, with a minimum of 5% being inspected each year.

E.3.3. Documentation to be submitted with each annual report:

a. Copies of the stormwater facility inspection reports compiled during the annual reporting period.

E.3.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date for Facility Inspections:* 2015
c. *Frequency of Actions:* Annual
d. *Month/Year of Each Action:* 2018 - 2022

E.3.5. Person (position) responsible for overall management and implementation of the BMP: Code Enforcement Officer

E.3.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP should result in the City being better able to ensure that stormwater facilities are operating properly as it relates to water quality management and flood control.

E.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City's current post construction stormwater management ordinance and the GSMM require that detention ponds be designed to remove 80% of TSS. Furthermore, routine inspections and performance of the required maintenance activities ensure that these detention ponds continue to function as intended and to meet water quality and flood control standards.

E.4. BMP: STORMWATER FACILITY MAINTENANCE PROGRAM

Permit Section: 4.2.5(b)4.a/b/b.1/b.2

E.4.1. Description of BMP

In order to compel the maintenance of privately-owned detention ponds or other stormwater facilities, the City adopted the Post-Construction Stormwater Management Control Ordinance that requires private owners to maintain their structural controls. The ordinance requires that an "Inspection and Maintenance Agreement" be developed for all new stormwater facilities designed in accordance with the ordinance. The City is granted the authority through the ordinance to inspect private stormwater facilities to ensure that they are being maintained in accordance with the agreement.

The City also has the responsibility to inspect and maintain publicly-owned stormwater facilities in accordance with the standards for maintenance included in the GSMM. Inspections of these facilities will occur such that 100% of the structures will be inspected over a five year period. The City of Senoia MS4 Inspection, Operation & Maintenance Procedures included in Appendix E provides guidance on stormwater facility maintenance. A summary list of all maintenance agreements completed after March 7, 2014 is also included in Appendix E. The City will perform maintenance activities on public stormwater facilities in accordance with applicable procedures utilizing information compiled through the detention pond inspections conducted by City staff.

E.4.2. Measurable Goal(s):

a. Ensure that 100% of private stormwater facilities (i.e. detention ponds) constructed after March 7, 2014 have an Inspection and Maintenance Agreement.
b. Notify private owners with existing Inspection and Maintenance Agreements of stormwater facility maintenance needs identified through inspections.
c. Perform the necessary maintenance on public detention ponds as required by ongoing inspections.

E.4.3. Documentation to be provided with annual report:

a. Summary list of all maintenance agreements adopted in the reporting period.
b. Work orders completed for publicly-owned detention ponds and publicly-maintained detention ponds that have been maintained during the reporting period.
c. Copies of notification letters sent to privately-owned, privately-maintained pond owners requesting needed maintenance.

E.4.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date:* 2015
c. *Frequency of Actions:* Annually
d. *Month/Year of Each Action:* 2018 - 2022

E.4.5. Person (position) responsible for overall management and implementation of the BMP: Community Development Director, Code Enforcement Officer, Public Works Superintendent

E.4.6. Rationale for choosing BMP and setting measurable goal(s):

Requiring developers/property owners to sign an Inspection and Maintenance Agreement as well as develop and implement inspection and maintenance plans for their stormwater facilities (i.e. detention ponds) should improve the oversight and operational function of these facilities. The development and implementation of maintenance procedures for the City to follow with regard to publicly-maintained detention ponds will result in improved operations of these facilities.

E.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City's existing ordinances require that detention ponds be designed to remove 80% of TSS and to provide flood control. Routine inspection and appropriate maintenance of both public and private detention ponds should ensure that they continue to function to meet applicable water quality and flood control goals. It is assumed that ongoing maintenance of the designated detention ponds should result in improved operation of these ponds thereby minimizing the discharge of pollutants to the City's MS4.

E.5. BMP: GREEN INFRASTRUCTURE (GI) LOW IMPACT DEVELOPMENT (LID) STRUCTURES

Permit Section: 4.2.5(b)5.a/b

E.5.1. Description of BMP

There are currently no privately-owned non-residential and publicly-owned water quality-related Green Infrastructure (GI) / Low Impact Development (LID) structures within the City. When structures are added, the City will develop an inventory that will at a minimum contain information on the type, location, and number of GI/LD structures such as bio-retention, bio-swales, pervious pavement, green roofs, etc.

E.5.2. Measurable Goal(s):

a. Annually update the inventory as new GI/LID structures are constructed.

E.5.3. Documentation to be submitted with each annual report: An updated inventory, including structures added during the reporting period.

E.5.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date:* 2014
c. *Frequency of Actions:* As new GI/LID structures are constructed
d. *Month/Year of Each Action:* 2018 - 2022

E.5.5. Person (position) responsible for overall management and implementation of the BMP: Community Development Director

E.5.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will allow the City to identify the location of GI/LID structures and to then perform inspections of the BMPs to ensure that they operate as designed in the future.

E.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Each type of GI/LID practice has an estimated pollutant removal efficiency. By encouraging the incorporation of these types of best practices into new and redevelopment projects, the City can estimate the amount of pollutants being removed by these best practices. Furthermore, an inventory is necessary for inspection and maintenance purposes because proper maintenance is essential to achieving the desired pollutant removal efficiency.

E.6. BMP: GI/LID PROGRAM

Permit Section: 4.2.5(a)6.b/c

E.6.1. Description of BMP:

As is required for permittees with a population less than 10,000, the City will develop and implement a program for the inspection and maintenance of inventoried GI/LID structures, including City-owned structures, structures owned by other public entities, and privately-owned, non-residential structures. The program will meet the requirements specified by Section 4.2.5(a)6 and 7 of the City's NPDES Phase II MS4 Permit. The City will submit a copy of the program to the EPD no later than February 15, 2020 and include the GI/LID Program as an addendum to this SWMP (Appendix G).

E.6.2. Measurable Goal(s):

a. Develop and implement GI/LID Program and submit to the EPD by February 15, 2020

E.6.3 Documentation for Annual Report:

a. GI/LID Program (by 2020)
b. After 2020, copy of GI/LID Program if updated during the reporting period.

E.6.4 Schedule:

a. February 15, 2020, and annually thereafter

E.6.5 Person (Position) responsible for overall management and implementation of the BMP:

Community Development Director

E.6.6 Rationale for choosing BMP and setting measurable goal(s):

This BMP allows the City to identify the location and maintenance needs of GI/LID structures.

E.6.7 How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:

Each type of GI/LID practice has an estimated pollutant removal efficiency. By encouraging the incorporation of these types of practices in new development and redevelopment, the City can estimate the amount of pollutants being removed through these practices. Routine inspection and appropriate maintenance ensure that GI/LID practices continue to function to meet infiltration and water quality goals.

E.7. BMP: GI/LID INSPECTION AND MAINTENCE PROGRAM

Permit Section: 4.2.5(a)7.a/b/c

E.7.1. Description of BMP:

Beginning in 2020, the City will conduct inspections and/or ensure inspections are conducted on 100% of inventoried GI/LID structures in accordance with the inspection schedule set forth in the City's GI/LID Program discussed in BMP E.6.

Maintenance will be conducted as needed on City-owned structures, and the City will implement maintenance procedures for inventoried structures that are not owned by the City in accordance with the GI/LID Program developed as BMP E.6.

E.7.2. Measurable Goal(s):

a. Beginning in 2020, conduct inspections of GI/LID structures in accordance with City GI/LID Program
b. Beginning in 2020, conduct maintenance of City-owned GI/LID structures as needed
c. Beginning in 2020, implement maintenance procedures for inventoried GI/LID structures not owned by the City in accordance with City GI/LID Program

E.7.3 Documentation for Annual Report:

a. Documentation of inspections.
b. Number of structures and percentage of total structures maintained during the reporting period
c. Documentation of maintenance procedures and activities

E.7.4 Schedule:

a. 2020 and annually thereafter as specified by the City's GI/LID Program

E.7.5 Person (Position) Responsible for Overall BMP Management and Implementation:

Code Enforcement Officer and Public Works Superintendent

E.7.6 Rationale for choosing BMP and setting measurable goal(s):

This BMP allows the City to identify the location and maintenance needs of GI/LID structures.

E.7.7 How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:

Each type of GI/LID practice has an estimated pollutant removal efficiency. By encouraging the incorporation of these types of practices in new development and redevelopment, the City can estimate the amount of pollutants being removed through these practices. Routine inspection and appropriate maintenance ensure that GI/LID practices continue to function to meet infiltration and water quality goals.

F. POLLUTION PREVENTION/ GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

40 CFR Part 122.34(b)(6) Requirement: You 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.

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.6(a) of the NPDES Phase II MS4 permit.

F.1. BMP: MS4 CONTROL STRUCTURE INVENTORY & MAP

Permit Section: 4.2.6(a)1.a/b

F.1.1. Description of BMP

The City has completed and maintains a GIS inventory and map of MS4 control structures including catch basins, ditches, detention/retention ponds, and storm drain lines. The City will update this database annually to include new MS4 infrastructure that is accepted by the City and will provide updates on the status of this inventory in each annual report.

F.1.2. Measurable Goal(s):

a. Update the MS4 inventory and map annually to include the MS4 structures listed above that have been accepted by the City during the previous year.

F.1.3. Documentation to be submitted with each annual report:

a. The updated map and inventory list.
b. The number of structures added during the reporting period and the total number of structures in system.

F.1.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date:* 2015
c. *Frequency of Actions:* Ongoing
d. *Month/Year of Each Action:* 2018 - 2022

F.1.5. Person (position) responsible for overall management and implementation of the BMP: Community Development Director

F.1.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP provides the information necessary for the City to implement the MS4 Inspection and Maintenance Program as required by the NPDES Phase II MS4 Permit.

F.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The MS4 must function properly in order to reduce the discharge of pollutants from the public drainage system to the Maximum Extent Practicable (MEP) as required by the NPDES Phase II MS4 Permit. Routine inspection and then performance of the required maintenance activities should ensure that the MS4 continues to function as designed in terms of reducing the discharge of pollutants.

F.2. BMP: MS4 INSPECTION PROGRAM

Permit Section: 4.2.6(a)2.a

F.2.1. Description of BMP

The City will inspect 100% of the MS4 system components included in the MS4 control structure inventory over the five-year period of the permit, and will inspect, at a minimum, one MS4 structure each year. Inspections of the MS4 structures will be documented through an electronic field GIS collection application and will be conducted in accordance with the MS4 Inspection, Operation & Maintenance Procedures attached in Appendix E.

F.2.2. Measurable Goal(s):

a. Inspect 100% of the MS4 system components in the MS4 control structure inventory during the five-year permit period, inspecting at least one structure per year.

F.2.3. Documentation to be submitted in each annual report:

a. Number/length and percentage of total structures inspected and maintained during the reporting period.
b. Table summarizing individual electronic inspections with a record for each structure inspected, and the findings of that inspection.

F.2.4. Schedule:

a. *Interim Milestone Dates: N/A*
b. *Implementation Date:* 2015
c. *Frequency of Actions:* Annual
d. *Month/Year of Each Action:* 2018 - 2022

F.2.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

F.2.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP should enable the City to better maintain the MS4 and to ensure that it is functioning properly such that the discharge of pollutants is reduced to the MEP.

F.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The MS4 must function properly to reduce the discharge of pollutants from the system into downstream receiving water bodies. Routine inspections ensure that the required maintenance needs are promptly identified so appropriate MS4 maintenance activities can be undertaken. Furthermore, the inspection activities undertaken will identify the required maintenance needs of the MS4 such that sediment and debris removal can be performed thereby reducing the potential for these pollutants to be discharged from the system.

F.3. BMP: MS4 MAINTENANCE

Permit Section: 4.2.6(a)3.a

F.3.1. Description of BMP

Upon completion of an inspection, the City will determine if maintenance is needed based on inspection results and the City's maintenance criteria. The City will prioritize maintenance needs based on their potential impact to the functionality of the public MS4. Maintenance shall be prioritized and performed in general accordance with the following standards:

- The City will schedule appropriate maintenance as needed and in accordance with available City resources.
- The City will respond to all citizen complaints related to MS4 structures, and will perform maintenance as needed.
- Sediment will be removed before 50% of the capacity of the structure has been lost.
- Trash and debris will be removed from structures.
- Manmade and natural objects that are causing or could potentially cause a blockage to the system will be removed.
- Excess emergent vegetation will be removed.
- Bank side vegetation and vegetation in the maintenance right-of-way will be mowed or trimmed, but not removed to protect against erosion.
- Ditches that are not draining properly will be re-graded to match existing pipe invert grades, to the extent possible.
- Materials removed from the MS4 during maintenance will be properly disposed of by the City or a contractor hired by the City.
- Maintenance activities for MS4 structures are documented through the use of a Work Order database maintained by the City.

F.3.2. Measurable Goal(s):

a. Maintain 100% of MS4 structures based on the City's maintenance criteria, and as funding is available.

F.3.3. **Documentation to be provided in each annual report:** A summary of Work Orders created and completed related to MS4 structure maintenance.

F.3.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Ongoing
d. *Month/Year of Each Action:* 2018 - 2022

F.3.5. Person (position) responsible for overall management and implementation of the BMP: Public Works Superintendent

F.3.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will enable the City to identify MS4 structures in need of maintenance and to undertake the necessary actions to ensure the operational functionality of the MS4 on an

ongoing basis. Proper operation and maintenance of the MS4 is essential to ensure that the discharge of pollutants from the MS4 is minimized.

F.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The MS4 must function properly to reduce the discharge of pollutants from the system into downstream receiving water bodies and to meet applicable compliance requirements of the NPDES Phase II MS4 Permit. Proper maintenance of MS4 structures ensures that the system functions properly to meet this water quality goal. Furthermore, the activities undertaken such as sediment and debris removal from the MS4 can be documented to demonstrate that these pollutants are not ultimately being discharged from the system.

F.4. BMP: STREET, PARKING LOT AND RIGHT-OF-WAY (ROW) CLEANING

Permit Section: 4.2.6(b)4.a/b

F.4.1. Description of BMP

The City contracts with a private firm to perform street sweeping services to keep leaves and debris from being washed from the City's MS4 structures from the City streets and/or public parking lots. Litter and debris collected will be hauled to the landfill by the street sweeping contractor. Street cleaning activities and maintenance performed for City parking lots will be conducted in accordance with the City Street and Parking Lot Cleaning Procedures attached in Appendix F.

F.4.2. Measurable Goal(s):

a. Sweep city streets with curb and gutter at a frequency of at least 1 mile per year.
b. Sweep City parking lots once per year.

F.4.3. Documentation to be submitted with annual report:

a. Documentation of street sweeping activities (contractor invoice and/or location summary reports and/or waste receipts, etc) including length of streets swept and/or trash and debris removed.

F.4.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Ongoing
d. *Month/Year of Each Action:* 2018 - 2022

F.4.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

F.4.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will reduce the amount of leaves, litter, other debris and other potential pollutants from being discharged from City streets into the MS4.

F.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will keep records or make estimates of the amount of material collected, based on accepted estimation techniques, of the amount of leaves, debris and other materials removed through the activities described above.

F.5. BMP: EMPLOYEE TRAINING

Permit Section: 4.2.6(a)5.a/b

F.5.1. Description of BMP

The City will require one (1) training session per year for City employees involved in the implementation of the SWMP. The employee training will address pollution prevention by recognizing illegal connections, illegal dumping, spill prevention, and containment practices to avoid hazardous chemicals in the storm drain system. A description of each training program and number of employees in attendance will be reported on an annual basis. Alternatively, the City may send City staff to an established off-site training program that addresses stormwater issues. Training sessions will be documented, and the City will keep records of offsite training.

F.5.2. Measurable Goal(s):

a. Provide one training session (or acceptable offsite training) each year for employees who are involved with SWMP implementation.

F.5.3. Documentation to be submitted with each annual report:

a. Records of the number of staff that participated (sign-in sheets.)
b. Examples of materials from training session, as available (agenda, presentation, etc.).

F.5.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2015
c. *Frequency of Actions:* Annual
d. *Month/Year of Each Action:* 2018 - 2022

F.5.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

F.5.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will help reduce the possibility of accidental pollutant discharges as a result of activities undertaken by City employees during municipal operations that could adversely impact surface water quality.

F.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The proper education of City employees regarding the use, handling and disposal of potential storm water pollutants will reduce the possibility of spills or discharges related to routine municipal operations. If the training is performed and the City employees correctly execute the best practices taught to them, pollutant discharges should be eliminated and water quality should be protected accordingly.

F.6. BMP: WASTE DISPOSAL

Permit Section: 4.2.6(a)6.a

F.6.1. Description of BMP

The City will properly dispose of wastes including litter, debris, sediment, and other pollutants removed from the drainage system during maintenance, litter pickup, or any other maintenance activity involving the MS4. Waste will be disposed of in accordance with the MS4 Inspection, Operation, & Maintenance Procedures attached in Appendix E.

F.6.2. Measurable Goal(s):

a. The City will properly dispose of 100% of wastes removed from the MS4 in accordance with the MS4 Inspection, Operation, & Maintenance Procedures.

F.6.3. Documentation to be submitted in each annual report:

a. Documentation of waste disposal activities including landfill receipts that show the quantities of waste materials disposed during the reporting period.

F.6.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Ongoing
d. *Month/Year of Each Action:* 2018 - 2022

F.6.5. Person (position) responsible for overall management and implementation of the BMP:

Code Enforcement Officer and Public Works Superintendent

F.6.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP ensures wastes resulting from MS4 maintenance activities are properly disposed and thereby prevented from re-entering MS4.

F.6.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will keep records, or make well founded estimates, of the amount of waste and debris resulting from MS4 maintenance activities disposed of at the landfill.

F.7. BMP: NEW FLOOD CONTROL PROJECT ANALYSIS

Permit Section: 4.2.6(b)7.a

F.7.1. Description of BMP

The City will ensure that all new flood control projects are assessed for water quality impacts. For the purposes of this BMP, the City interprets "Flood Control Projects" to refer to detention/retention ponds and other stormwater management facilities. All new developments are currently required to comply with the City's Post-Construction Stormwater Management Ordinance and GSMM, which require that stormwater management controls address water quality as well as water quantity. The City currently reviews all development projects that include flood control structures pursuant to the Post-Construction Stormwater Management Ordinance and GSMM.

F.7.2. Measurable Goal(s):

a. Ensure 100% of new flood control projects comply with the City's Post Construction Stormwater Management Ordinance and GSMM.

F.7.3. Documentation to be submitted in each annual report:

a. The number of plans reviewed where new flood management projects were assessed for water quality impacts recorded in the reporting period.

F.7.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Annually and Ongoing
d. *Month/Year of Each Action:* 2018 - 2022

F.7.5. Person (position) responsible for overall management and implementation of the BMP: Community Development Director

F.7.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will improve the water quality management potential of flood control projects that are constructed throughout the City and that may be connected to the MS4.

F.7.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The GSMM provides water quality BMPs design information that includes pollutant removal efficiencies for all types of detention/retention facilities constructed or retrofitted in accordance with the GSMM standards. The City will provide information in the annual report on the number of site plans reviewed and the number of new stormwater facilities constructed in accordance with GSMM standards.

F.8. BMP: EXISTING FLOOD CONTROL PROJECTS

Permit Section: 4.2.6(b)8.a/b

F.8.1. Description of BMP

The City developed Water Quality Assessment Procedures to ensure that existing City flood management projects (i.e., detention and retention ponds) are assessed for potential retrofitting to address water quality impacts. These Procedures, which were approved by the Georgia EPD during the last permit period, have been revised to meet the requirements of the City's most recent MS4 Phase II permit. The City's revised Water Quality Assessment Procedures for Existing Flood Management Projects are provided in Appendix G.

The City will perform Water Quality Assessments for all City-owned detention and retention ponds during the 5-year permit period to assess the potential to retrofit these publicly-owned structures to incorporate additional control measures to improve water quality treatment. The assessment will also analyze the facility's compliance with the City's Post-Construction Stormwater Management Ordinance and CSS, which requires that stormwater management controls address specified water quality as well as water quantity criteria. Retrofitting activities will be conducted as specified in the Water Quality Assessment Procedures in Appendix G.

F.8.2. Measurable Goal(s):

a. Perform Water Quality Assessment for 100% of City-owned detention and retention ponds within the 5-year permit period.
b. Evaluate potential retrofitting, if applicable

F.8.3. Documentation to be submitted with each annual report: Records of any assessment and/or retrofitting activities conducted during the reporting period.

F.8.4. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2014
c. *Frequency of Actions:* Annually
d. *Month/Year of Each Action:* 2018 - 2022

F.8.5. Person (position) responsible for overall management and implementation of the BMP: Code Enforcement Officer

F.8.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will improve the water quality treatment potential of existing flood control projects undertaken and funded by the City.

F.8.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The GSMM provides water quality BMP design criteria and pollutant removal efficiencies for all types of flood control projects constructed or retrofitted in accordance with the GSMM standards. The City will provide information in the annual report on the number of existing flood control projects assessed and the number of flood control projects retrofitted to meet GSMM standards.

F.9. BMP: MUNICIPAL FACILITIES

Permit Section: 4.2.6(b)9.a/b

F.9.1. Description of BMP

The City will inspect all municipal facilities with the potential to contribute pollutants to the MS4 on an annual basis. The inventory of municipal facilities that currently require ongoing inspection includes: (1) Public Works facilities and (2) the Wastewater Treatment Plant and Land Application System (LAS) site. Inspections will be completed using the Municipal Facility Inspection Checklist included in Appendix G.

F.9.2. Measurable Goal(s):

a. The City will inspect 100% of identified municipal facilities over the five-year period of the permit.
b. The City will update the list of municipal facilities, if necessary.

F.9.3. Documentation to be submitted with each annual report:

a. A copy of the Municipal Facility Inspection form for sites inspected during the permit period.
b. An updated list of municipal sites if a new site is added**.**

F.9.4. Schedule:

a. *Interim Milestone Dates:* N/A
b. *Implementation Date:* 2015
c. *Frequency of Actions:* Once every five years
d. *Month/Year of Each Action:* 2018 - 2022

F.9.5. Person (position) responsible for overall management and implementation of the BMP:

Code Enforcement Officer

F.9.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will reduce the potential for pollutants to be discharged from municipal sites into the MS4 as a result of the inspections performed which should identify potential storm water pollution issues and remove them prior to discharge.

F.9.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain records of municipal facility inspections and document any pollutant discharges noted on municipal sites. If the site inspections are done on a regular basis then the likelihood of pollutant discharges should be minimized as a result of those proactive measures taken by the City.

G. ENFORCEMENT RESPONSE PLAN

G.1. ENFORCEMENT RESPONSE PLAN (ERP)

Permit Section: 4.3

G.1.1. Description of BMP

The City has developed an ERP, which includes references to the applicable ordinances that provide legal authority to implement the SWMP, the types of enforcement mechanisms available, escalation of enforcement, time frames for investigation, and the method to be used to track instances of non-compliance. The ERP was reviewed and approved by the Georgia EPD during the previous permit cycle. The City will annually review and update the ERP to reflect any ordinance amendments. A copy of the updated ERP is included in Appendix E.

G.1.2. Measurable Goal(s):

a. Implement ERP
b. Annually review ERP to determine if updates are needed

G.1.3. Documentation for Annual Report:

a. Copy of ERP, if updated during the reporting period.
b. Document enforcement actions taken during the reporting period (number, type, and status of enforcements actions).

G.1.4. Schedule:

a. *Interim Milestone Dates:* N/a
b. *Implementation Date:* 2015
c. *Frequency of Actions:* Ongoing
d. *Month/Year of Each Action:* 2018 - 2022

G.1.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

G.1.6. Rationale for choosing BMP and setting measurable goal(s):

Effective enforcement of the City ordinances is necessary to ensure that they appropriately regulate various aspects of the SWMP to protect water quality.

G.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City will maintain records of the number and nature of enforcement actions undertaken through the ERP.

H. IMPAIRED WATERS IMPLEMENTATION PLAN

H.1. IMPAIRED WATERS PLAN

Permit Section: 4.4.1

H.1.1. Description of BMP

The City currently has no MS4 outfalls discharging to any waterways listed on the 2018 305 (b)/303(d) list and is therefore not currently required to submit an Impaired Waters Plan. However, should any of the waterways within the City be listed, or if the City adds MS4 outfalls that discharge to listed waterways, then the City will develop and implement an Impaired Waters Plan (the Plan) to reduce the pollutant of concern (POC) on each impaired segment. The Plan will generally include the following:

- A list of the impaired waters on the current 303(d) listed and the associated POC;
- A map showing the location of impaired waters and all identified MS4 outfalls; located on the impaired waters or within one linear mile upstream of the impaired waters;
- BMPs that will be implemented to address the POCs;
- A schedule for implementing the BMPs.

The Plan will be developed and submitted to EPD in the first annual report following the listing or the addition of an applicable MS4 outfall. After the initial IWP is developed and approved, the City will review the 303(d) list annually, and add any new impaired waters to the Plan.

H.1.2. Measurable Goal(s):

a. Annually review the latest 305(b)/303(d) list and MS4 outfalls to determine if the City is required to submit an Impaired Waters Plan.
b. Develop/revise Impaired Waters Plan and submit it to EPD for approval.
c. Implement the Impaired Waters Plan and BMPs in accordance with the schedule outlined in the plan.

H.1.3. Schedule:

a. *Interim Milestone Dates:* n/a
b. *Implementation Date:* 2018
c. *Frequency of Actions:* Annual
d. *Month/Year of Each Action:* 2018 - 2022

H.1.4. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

H.1.5. Rationale for choosing BMP and setting measurable goal(s):

Identifying and implementing BMPs targeted at the POC(s) will help to address known water quality impairments within local streams.

H.1.6. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Prioritized implementation of BMPs targeted at the POC of listed waterways should improve water quality conditions within these waterways.