Existing Phase II MS4

Storm Water Management Program
City of Dunwoody, GA

June 4, 2018

Revised: July 26, 2019
Revised: February 15, 2021

STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

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

1. General Information

A. Name of small MS4: City of Dunwoody, Georgia

B. Name of responsible official: Eric Linton
Title: City Manager
Mailing Address: 4800 Ashford Dunwoody Road
City: Dunwoody State: GA Zip Code: 30338
Telephone Number: 678-382-6700

C. Designated stormwater management program contact:
Name: Carl Thomas
Title: Stormwater Utility Manager
Mailing Address: 4800 Ashford Dunwoody Road
City: Dunwoody State: GA Zip Code: 30338
Telephone Number: 678-382-6864
Email Address: Carl.Thomas@dunwoodyga.gov

2. Sharing Responsibility

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

Control Measure or BMP:

1. Name of entity: N/A

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

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

3. Minimum Control Measures and Appendices

A. Public Education and Outreach

B. Public Involvement/Participation
C. Illicit Discharge Detection and Elimination
D. Construction Site Stormwater Runoff Control
E. Post-Construction Stormwater Management in New Development and Redevelopment
F. Pollution Prevention/Good Housekeeping
G. Appendix – Enforcement Response Plan
H. Appendix – Impaired Waters

4. Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: Carl Thomas Date: _____

Signature: _____ Title: Stormwater Utility Manager

Storm Water Management Program

Public Education and Outreach on Storm Water Impacts

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

A. Best Management Practice (BMP) #1

1. Target audience: General Public

2. Description of BMP: Pamphlet Distribution – Pamphlets and fliers covering stormwater pollution topics are placed by MS4 staff in the lobby of City Hall. Pamphlets and fliers will be restocked if necessary. The number of pamphlets or fliers picked up in a given year will be determined by subtracting the number of pamphlets that are left at the end of the year from the total number of pamphlets stocked throughout the year.

3. Measurable goal(s): 100 pamphlets will be placed in the lobby of City Hall annually.

4. Documentation to be submitted with each annual report: Copies of the brochures placed and a spreadsheet of the tracking information (number placed/restocked, number picked up, etc.) for each brochure title will be provided in the annual report.

5. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

7. Rationale for choosing BMP and setting measurable goal(s): This BMP addresses stormwater runoff and pollution control issues within the City and raises the public's awareness of these issues.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The distribution of pamphlets reflects increased community awareness.

B. BMP #2

1. Target audience: General Public

2. Description of BMP: City Website – The City's Stormwater Management webpage has introductory information about stormwater, including concepts, issues and an explanation of the City's role in the operation of the MS4 system. A downloadable copy of the City's Stormwater Management Program is also available on the webpage. The IT Department maintains the website and tracks the number of visitors to the webpage.

3. Measurable goal(s): The City's website will be updated annually.

4. Documentation to be submitted with each annual report: The number of clicks tracked on the Stormwater Management webpage and the web analytics will be provided in each annual report.

5. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

6. Person (position) responsible for overall management and implementation of the BMP: Communications Director

7. Rationale for choosing BMP and setting measurable goal(s): Articles/posters will educate and inform the public about local stormwater issues, solutions or stormwater-related events.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The City's involvement of community members in the stormwater program will reflect the effectiveness of the BMP.

C. BMP #3

1. Target audience: General Public

2. Description of BMP: Social Media Campaign – The City will use social media to educate the public about stormwater issues by publishing informational posts to one or more of its social media groups. Posts may include updates regarding City services, programs or events that relate to MS4 activities (street-sweeping, stream clean-ups, etc.) and how those services, programs or events improve water quality.

3. Measurable goal(s): At least one stormwater-related post will be shared over one or several of the City's social media groups annually.

4. Documentation to be submitted with each annual report: The post will be archived through screenshots and submitted in each annual report.

5. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

6. Person (position) responsible for overall management and implementation of the BMP: Communications Director

7. Rationale for choosing BMP and setting measurable goal(s): Providing information about local stormwater issues through social media is an effective and efficient way to reach a wide audience. This kind of communication strengthens the City's relationship with the public.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The City's efforts to make information on stormwater accessible to its citizens will reflect the effectiveness of the BMP.

D. BMP #4

1. Target audience: General Public

2. Description of BMP: Public/Government Official Presentations – City staff involved in MS4 activities give presentations to the public and government officials that stormwater runoff issues that arise as a result of construction activities and/or the addition of impervious area and how different development choices can affect downstream communities. Presentation topics include the effect of increased impervious area, the use of flood management structures (detention/retention ponds) and residential site selection. The purpose of these presentations is to educate citizens and/or public officials about the importance of incorporating sustainable site development principles into the design process.

3. Measurable goal(s): A presentation will be given to the public and/or elected officials at least once annually.

4. Documentation to be submitted with each annual report: Pictures of the presentation, a list of attendees and any educational materials used will be provided in each annual report.

5. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

7. Rationale for choosing BMP and setting measurable goal(s): Presenting educational material on stormwater provides an opportunity for the public to learn the role of stormwater planning in sustainable site design and how it affects them and their community directly.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The involvement of the community in the stormwater program will reflect the effectiveness of the BMP.

Public Involvement/Participation

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

A. Best Management Practice (BMP) #1

1. Target audience/stakeholder group: General Public

2. Description of BMP: Storm Drain Marker Program – The City will purchase storm drain markers and proper installation equipment so that markers can be attached to catch basins and inlets. City MS4 staff will coordinate with local volunteer groups to have at least one storm drain marking event annually. The City will provide volunteers with the markers, installation materials, maps of the structures to be marked and a sign-in sheet. Volunteers will be asked to sign their names on the maps they are given or the sign-in sheet. As structures are marked, volunteers will check off those structures on the provided maps. Upon completion, volunteers will return completed sign-in sheets, the signed and/or annotated maps to the City to be used as documentation of the activity.

3. Measurable goal(s): Hold one storm drain marking event annually.

4. Documentation to be submitted with each annual report: Sign-in sheets, signed and/or annotated maps returned from volunteers with total number of structures marked will be submitted in each annual report.

5. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

7. Rationale for choosing BMP and setting measurable goal(s): Marking storm drains raises awareness of stream health and pollution sources, which should result in a reduction of trash and yard debris in the MS4.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Community participation in this activity will reflect increased public awareness about proper use of the MS4.

B. BMP #2

1. Target audience/stakeholder group: General Public

2. Description of BMP: Stream Clean-up – The Public Works Department oversees the organization of an annual stream clean-up event. One staff member from the Department serves as the primary contact for any interested volunteers. The event is publicized through various means, such as email blasts, posts on the City website, ads on social media and local volunteering sites. The managing staff member is responsible for providing information to potential volunteers, volunteer registration, final site selection and supplying City-purchased materials for the event. Site selection is based primarily on need and accessibility. Any clean-up sites suggested by residents can be brought into consideration during the selection process. Debris removed during the stream clean-up event is bagged and disposed of at the City's expense.

3. Measurable goal(s): Hold one stream clean-up event per year.

4. Documentation to be submitted with each annual report: Volunteer sign-in sheets and pictures from the event will be provided in each annual report.

5. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

7. Rationale for choosing BMP and setting measurable goal(s): Provides public education and involvement in stream health and clean-up. Provides trash removal from community streams.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The number of volunteers participating and the amount of trash removed from the stream will demonstrate the effectiveness of this BMP.

C. BMP #3

1. Target audience: General Public

2. Description of BMP: Recycling Event – The City of Dunwoody hosts recycling events as a way for residents to dispose of items that are not commonly accepted by the County trash pick-up or recycling programs. The events are hosted by the Dunwoody Sustainability Committee as part of the City's Sustainability Initiative. Scheduled recycling events are advertised to City residents through social media, subscription-based emails and the City's website calendar. Information including event location, date, time and materials being accepted are also provided. The location of each event is determined based on local availabilities.

3. Measurable goal(s): At least one recycling event will be hosted annually.

4. Documentation to be submitted with each annual report: Pictures of the event and invoices for the recycling of materials collected will be provided in each annual report.

5. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

6. Person (position) responsible for overall management and implementation of the BMP: Sustainability Committee

7. Rationale for choosing BMP and setting measurable goal(s): This BMP addresses the need to provide public access to disposal methods for items that are not regularly accepted by the local County trash pick-up or recycling program or items that may be detrimental to the environment if disposed of improperly.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The hosting of this type of event and the participation of citizens in the event will reflect the effectiveness of the BMP.

D. BMP #4

1. Target audience: General Public

2. Description of BMP: Citizen Hotline – The stormwater utility is operated and maintained by the City's Public Works Department. Citizens are able to call the Public Works Department's line at any time to report issues or concerns regarding the stormwater system. During non-business hours, the Public Works line rolls over to the scheduled on-call staff member. Calls are documented in the City's electronic work management system, Cityworks, as service requests. When appropriate, a work order is created and associated with the request. Upon resolution, service requests and work orders are closed. Detailed information about the call, the reported issue and follow-up activities are documented and compiled annually for submission to the EPD.

3. Measurable goal(s): Stormwater Management staff will use Cityworks, the City's existing electronic request and work order system for the Public Works Department, to track all incoming citizen calls related to stormwater concerns.

4. Documentation to be submitted with each annual report: Records regarding stormwater calls received during the reporting year will be exported from Cityworks to a spreadsheet to be provided in that year's annual report.

5. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Ongoing
    d. Month/Year of each action (if applicable): N/A

6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

7. Rationale for choosing BMP and setting measurable goal(s): Education and awareness hold great power and potential to incentivize changes in public attitudes and behaviors with respect to stormwater pollution.

8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Stormwater Management staff will continually review this BMP and modify if necessary. Staff will also monitor, track, and document all stormwater related citizen calls.

Illicit Discharge Detection and Elimination

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

A) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls;

B) Effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions;

C) Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to your system; and

D) Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

A. BMP #1

1. Description of BMP: Legal Authority – Code of Ordinances Chapter 32. Article IV, Division 9-Illicit Discharge and Illegal Connection. The BMP is based on the model ordinance of the Metropolitan North Georgia Water and Planning District (MNGWPD).

2. Measurable goal(s): Review ordinance annually for recommended changes made by the MNGWPD and revise the current ordinance as applicable.

3. Documentation to be submitted with each annual report: If revisions are made, a copy of the updated ordinance will be included in that year's annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually as needed
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): The BMP will provide the City the means to investigate and take steps to eliminate illicit discharges and illegal connections within the City.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Effectiveness will be based on the City's ability to remove an illegal connection or illicit discharge from the MS4.

B. BMP #2

1. Description of BMP: Outfall Map and Inventory – The City's Outfall Map and Inventory is maintained and updated by the GIS staff in coordination with the Public Works Department. Updates are made during field investigations associated with dry weather screening of outfalls and as new construction occurs.

2. Measurable goal(s): The map and inventory of outfalls will be updated annually.

3. Documentation to be submitted with each annual report: The map of inventoried outfalls will be submitted with each annual report, showing the location of the outfalls and names of tributaries. The updated inventory of outfalls will be provided in each annual report, along with the total number of outfalls and the number of outfalls added and/or removed from the inventory.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

6. Rationale for choosing BMP and setting measurable goal(s): The outfall map and inventory will allow the City to better determine potential pollution sources/areas.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: If the mapped location of the outfall helps find the effluent from or identify the source of an illicit discharge or illegal connection, that will be a measure of the BMP's effectiveness. Absence of illegal connections or illicit discharges will also reflect the overall effectiveness of the BMP and program.

C. BMP #3

1. Description of BMP: IDDE Plan – Illicit discharges are unpermitted non-stormwater flows to the stormwater drainage system. Illicit discharges can be direct discharges or dumping to the stormwater system, or can occur through upstream activities. Illegal connections are physical connections such as pipes that allow illicit discharges to enter the stormwater system on an intermittent or ongoing basis. Screening of stormwater outfalls for illicit discharges is performed during periods of dry weather to avoid the screening of flows that may have resulted from wet weather events. The City screens outfalls by geographical location, scheduling the areas such that 100% of the outfalls are screened within a 5-year period. When a dry weather flow is observed at an outfall, the procedures for tracing the source of the flow, as well as eliminating any identified illicit discharge or illegal connection, are followed.

2. Measurable goal(s): Perform dry weather screening of all outfalls within the scheduled geographical area(s) each year such that all outfalls are screened within a 5-year period. Trace and eliminate all dry weather flows as soon as they are discovered.

3. Documentation to be submitted with each annual report: All outfall inspections performed during the reporting year will be logged and provided in each annual report. Documentation of any source tracing and elimination activities conducted will also be provided in that year's report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

6. Rationale for choosing BMP and setting measurable goal(s): Dry weather screenings are useful in identifying illicit discharges. The geographically-based schedule for annual outfall screening will allow for all outfalls to be inspected with a 5-year period.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Detection and removal of illegal connections and illicit discharges discovered in the

screening process will reflect the effectiveness of the BMP. Finding no illicit discharges will also reflect the effectiveness of the BMP and program.

D. BMP #4

1. Description of BMP: Education – Informational material covering topics on illegal discharge prevention will be placed in the lobby of City Hall. Pamphlets and fliers will be restocked if necessary. The number of pamphlets and/or fliers picked up in a given year will be determined by counting the number of pamphlets that are left at the end of the year and subtracting that number from the total number of pamphlets stocked throughout the year. The purpose of this BMP is to inform the public, employees and businesses of the hazards associated with illegal discharges and how to prevent them in the household and/or workplace. Because this BMP is closely related to the Public Education BMP #1, the City will ensure that pamphlets related to illicit discharge topics are included in the education package to be stocked in the lobby of City Hall.

2. Measurable goal(s): 50 pamphlets or fact sheets related to IDDE will be placed in the lobby of City Hall annually.

3. Documentation to be submitted with each annual report: Copies of the brochures placed and a spreadsheet of the tracking information (number placed/restocked, number picked up, etc.) for each brochure title will be provided in the annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

6. Rationale for choosing BMP and setting measurable goal(s): Distributing educational materials related to the negative impacts illicit discharges have on stream health increases public awareness and also serves to educate target groups within the community about how they can prevent this type of pollution.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Distribution of educational material will reflect public awareness of the problems that the materials identify.

E. BMP #5

1. Description of BMP: Complaint Response – Complaints are submitted via email, phone, mobile app or in person. Upon receipt of a complaint, the City creates a log of the complaint (date, type and status) in its electronic tracking system, investigates/verifies the complaint, determines responsibility, notifies the responsible party or parties and ensures corrective measures are taken. If an illicit discharge is not found the case is closed as no violation found. If an illicit discharge is located, the responding officer from Code Enforcement and/or Land Development records the findings in case notes and with photo documentation. Cases are followed through until the violation has been resolved. Upon resolution, the complaint is closed in the tracking system.

2. Measurable goal(s): Respond to 100% of illicit discharge complaints received within 3 business days. Record the complaints received and investigated annually.

3. Documentation to be submitted with each annual report: The log of complaints, individual status and any information regarding resolutions will be summarized and provided in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Enlisting the public in identifying illicit discharges and illegal connections along with tracking these complaints helps to remove verified illicit discharges from the MS4.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The effectiveness of the BMP will be reflected through the verification of illegal connections and/or illicit discharges from the complaints received.

Construction Site Storm Water Runoff Control

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

A) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance;

B) Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;

C) Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;

D) Procedures for site plan review which incorporate consideration of potential water quality impacts;

E) Procedures for receipt and consideration of information submitted by the public; and

F) Procedures for site inspection and enforcement of control measures.

A. Best Management Practice (BMP) #1

1. Description of BMP: Legal Authority – The City has an Erosion and Sediment Control Ordinance and a Litter Control ordinance to control construction site waste.

2. Measurable goal(s): Annually evaluate and, if necessary, modify the existing ordinances to comply with current laws or regulations.

3. Documentation to be submitted with each annual report: If updates are made to the ordinance, the updated version will be provided in the annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): The BMP provides the legal means to control Erosion and Sediment on construction sites as well as site-generated waste.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The City's ability to enforce regulations regarding site-generated waste will demonstrate this BMP's effectiveness.

B. BMP #2

1. Description of BMP: Site Plan Review Procedures – A project requires an LDP when 1.0 acre or more will be disturbed. Plans for these projects are reviewed by City of Dunwoody (LIA) certified plan reviewers in the Community Development Department in order to determine their conformance with regulations. Upon receipt of an application and plan for a permit, the City refers these materials to the soil and water conservation district for its review and approval. The district has 35 days to approve or deny plans received. If a determination has not been made by the district after 35 days, the plan is considered approved by the district. Permits are issued or denied by the City within 45 days of receiving a complete application. If the permit is denied, the reason for denial is provided to the applicant. Revised plans must also be approved or denied within 35 days.

2. Measurable goal(s): The City's Site Plan Review Procedures will be followed for all site plans submitted for an LDP.

3. Documentation to be submitted with each annual report: The number of plans submitted, reviewed, approved and/or denied will be provided on a spreadsheet in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): As needed

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Requiring an LDP review process will set minimum standards for the design and construction of land disturbance activities.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Meeting the minimum design standards improves water quality by reducing stream turbidity and site construction waste.

C. BMP #3

1. Description of BMP: Inspection Program – Conduct inspections of construction sites in accordance with the Georgia Soil and Water Conservation Commission (GSWCC). All projects with an active LDP are to be inspected to ensure that proper E&SC measures have been installed and maintained according to the requirements of the GSWCC and the Stormwater Management Ordinance. Inspections are conducted by the Community Development Department by personnel certified in the fundamentals of E&SC. The lead inspector is required to have a Level II certification as a plan reviewer. Inspections are conducted following the Field Manual for Erosion and Sediment Control in Georgia ("Green Book"). Inspections are described in the Code of Ordinances Sec. 16-95. - Inspections and maintenance. Inspections are conducted least once every seven calendar days and within 24 hours of each significant rainfall event.

2. Measurable goal(s): All LDP sites will be inspected throughout the project per the City's Code of Ordinances Sec. 16-95. - Inspections and maintenance.

3. Documentation to be submitted with each annual report: A list of active LDP sites and inspections conducted will be provided with each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): As needed
    d. Month/Year of each action (if applicable): Annually

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Inspections establish accountability of the permit holder to meet the requirements of the permit and to limit pollutants from leaving the permit site.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Conducting inspections on construction sites will reflect the effectiveness of this BMP since these limit the number of permit violations.

D. BMP #4

1. Description of BMP: Enforcement Procedures - Implement enforcement procedures for E&SC violations as outlined in the Code of Ordinances Sec. 16-35 – Enforcement and in the City's Enforcement Response Plan.

2. Measurable goal(s): Enforcement actions will be taken on all violations found during site inspections.

3. Documentation to be submitted with each annual report: Enforcement actions taken during the reporting period will be provided in each annual report, along with the number of each type of action taken and the status of the action.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Enforcement actions will create financial incentives for permittees to comply with the E&SC laws and will ultimately reduce pollution.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The City's ability to enforce E&SC regulations, require corrective measures on a construction site and eliminate sources of pollution demonstrates the effectiveness of this BMP.

E. BMP #5

1. Description of BMP: Complaint Response - Complaints are submitted via email, phone, mobile app or in person. Upon receipt of a complaint, the City creates a log of the complaint (date, type and status) in its electronic tracking system, investigates/verifies the complaint, determines responsibility, notifies the responsible party or parties and ensures corrective measures are taken. Code Enforcement records the findings in case notes and with photo documentation. Cases are followed through until the violation has been resolved. Upon resolution, the complaint is closed in the tracking system.

2. Measurable goal(s): Respond to 100% of complaints received within 3 business days. Record the complaints received and investigated annually.

3. Documentation to be submitted with each annual report: The log of complaints, individual status and any information regarding resolutions will be summarized and provided in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Involving the public in identifying E&SC issues will assist the City in correcting potential pollution sources.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The City's ability to respond to complaints regarding E&SC issues will demonstrate this BMP's effectiveness.

F. BMP #6

1. Description of BMP: Certification - City Staff involved in construction activities subject to the construction general permits will be trained and certified in accordance with the rules adopted by the GSWCC.

2. Measurable goal(s): City staff involved in MS4 activities will maintain required certifications and renew them as needed annually.

3. Documentation to be submitted with each annual report: Copies of MS4 employee certification cards and/or print-outs from the GSWCC website will be provided in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Certified and trained staff will provide a greater level of awareness of E&S requirements and procedures.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Training and certification of City staff in E&SC principles will improve implementation of the regulations.

Post-Construction Storm Water Management in New Development and Redevelopment

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

A) Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;

B) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development or redevelopment projects; and

C) Ensure adequate long-term operation and maintenance of BMPs.

See Table 4.2.5 (a) of the Permit

A. BMP #1

1. Description of BMP: Legal Authority - Enforce the Standards of the Stormwater Management Ordinance as adopted in Chapter 16, Article II, Division 5 (Stormwater Management) of the City of Dunwoody, Georgia Code of Ordinances.

2. Measurable goal(s): Annually evaluate and, if necessary, modify the existing ordinance to comply with current laws or regulations.

3. Documentation to be submitted with each annual report: If the ordinance is revised, a copy of the updated ordinance will be submitted with the following annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): The ordinance provides standards within the community to control the release of stormwater from construction sites.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Enforcement of the design standards will result in the implementation of pollution control devises with greater stormwater runoff control.

B. BMP #2

1. Description of BMP: Inventory - Maintain an inventory of all publicly-owned post construction stormwater management structures (e.g., detention/retention ponds, water quality vaults) and privately-owned structures designed after December 9, 2008 and those other structures that the City maintains. The inventory consists of information on the number and type of structures and the ownership (e.g., public, private).

2. Measurable goal(s): Update the inventory annually as new structures are added to the system.

3. Documentation to be submitted with each annual report: An updated inventory of post-construction stormwater management structures that are publicly-owned, privately-owned and designed after December 9, 2008 and those other structures the City maintains will be provided in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): The inventory of existing and new structures in the community facilitates periodic inspection and maintenance for proper operation.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Maintaining an up to date inventory will help keep structures operating properly through scheduled inspection and maintenance, reducing peak runoff and erosion.

C. BMP #3

1. Description of BMP: Inspection Program - The City conducts inspections on all post-construction stormwater management structures included in the inventory, which includes all City-owned ponds, public ponds owned by other entities, privately-owned facilities designed after December 9, 2008 and those other structures the City maintains. The appropriate form in the current Georgia Stormwater Management Manual (GSMM) will be used during all inspections. The City will conduct inspections of the post-construction stormwater management structures according to their geographical location such that 100% are inspected within a 5-year period. Deficiencies found during the inspection of any post-construction facility will be repaired as soon as practicable or as funding is available. Upon discovery of a deficiency in privately-owned facilities, the property owner will receive a letter outlining the issues and necessary corrections.

2. Measurable goal(s): One geographical area will be inspected each year such that all structures are inspected within a 5-year period.

3. Documentation to be submitted with each annual report: Records from inspections conducted during the reporting period will be submitted with that year's annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

6. Rationale for choosing BMP and setting measurable goal(s): Inspections will identify maintenance needs & will ensure proper operation of the structure.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Inspections provide for the identification of system deficiencies, leading to necessary maintenance activities that reduce potential pollution sources.

D. BMP #4

1. Description of BMP: Maintenance Program - Maintenance needs will be evaluated during the scheduled inspections of City-owned ponds, privately-owned ponds and ponds owned by other public entities. Inspections are conducted using the appropriate form from the latest version of the GSMM. Upon discovery of deficiencies in privately-owned ponds and other ponds not City-owned, the City will send a letter to the owner outlining the problematic conditions. Deficiencies found in City-owned ponds will be fixed by the City as soon as practicable or as funding is available for the necessary maintenance.

2. Measurable goal(s): All necessary maintenance will be carried out on City-owned ponds as soon as practicable and as funding is available. Owners of other ponds will be notified of any deficiencies within 30 days of inspection.

3. Documentation to be submitted with each annual report: Invoices and/or records of work performed on City-owned ponds during the reporting period will be provided in that year's annual report along with the list of work orders for City-owned facilities obtained from the Cityworks database. The list of maintenance agreements for other ponds and any letters sent notifying owners of needed maintenance will also be provided in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

6. Rationale for choosing BMP and setting measurable goal(s): Maintenance is a vital part in the long-term operation of stormwater structures and tracking maintenance activities helps in planning and preparing for future needs.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Maintenance activities will potentially eliminate a pollution source and will facilitate the proper functioning of the stormwater structures.

E. BMP #5

1. Description of BMP: GI/LID Structures Inventory - The City maintains an inventory of water quality GI/LID structures (e.g., bioswales, pervious pavement, rain gardens, cisterns, green roofs) that are located within the City and that were constructed after December 6, 2012. The inventory includes structures that are City-owned, publicly-owned by other entities and privately-owned non-residential structures. The addition of new GI/LID structures to the inventory is tracked through the plan review process.

2. Measurable goal(s): The inventory of all public and private non-residential GI/LID structures will be updated annually.

3. Documentation to be submitted with each annual report: The updated inventory of GI/LID structures and the total number of each type of structure will be submitted in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Identifying and inventorying GI/LID Structures will help the City track pollution and runoff reducing structures within the basins.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Having an inventory of GI/LID structures demonstrates the presence of structures within the City that are beneficial to local waterways. The presence of these structures also shows the City's awareness of the need to include these types of facilities when possible.

F. BMP #6

1. Description of BMP: GI/LID Program - Develop a program describing the GI/LID practices to be implemented. The program will include: procedures for evaluating the feasibility and applicability of different GI/LID techniques; a list of the allowed GI/LID structures within the City; inspection and maintenance procedures for all GI/LID structures within the City (includes those owned by the City, those owned by other public entities and privately-owned non-residential structures).

2. Measurable goal(s): Submit the GI/LID program to the EPD by February 15, 2020.

3. Documentation to be submitted with each annual report: Include the program in the SWMP by February 15, 2020 and implement it upon submission to the EPD.

4. Schedule:

    a. Interim milestone dates (if applicable): February 15, 2020
    b. Implementation date (if applicable): 2020
    c. Frequency of actions (if applicable): N/A
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Following a GI/LID program that outlines procedures for selecting appropriate GI/LID structures will help to select the most effective sustainability measures for a given site. Providing a clear guide for the long term operation of GI/LID structures within the City will help in getting the most benefits possible from these types of structures.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The successful installation and operation of GI/LID structures within the City will demonstrate the effectiveness of the BMP.

G. BMP #7

1. Description of BMP: GI/LID Inspection and Maintenance Program – Beginning in 2020, the City will begin performing inspections on all structures in the GI/LID inventory such that all are inspected within a 5-year period. Inspections and maintenance will be completed on City-owned ponds in accordance with the schedule outlined in the submitted GI/LID program. GI/LID structures that are publicly-owned by other entities and structures that are non-residential and privately-owned are inspected and maintained by their respective owner(s).

2. Measurable goal(s): Conduct annual inspections on 100% of the GI/LID structures within a 5-year period, following the GI/LID Program, starting February 15, 2020. Perform maintenance on City-owned GI/LID structures as needed. Privately-owned non-residential GI/LID structures and those publicly-owned by other entities will be maintained by the owner.

3. Documentation to be submitted with each annual report: The number of permittee-owned structures and the percentage of the total permittee-owned structures maintained during the reporting period will be provided in each annual report. Inspection reports and maintenance activities from the reporting period will also be submitted in that year's annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): February 15, 2020
    c. Frequency of actions (if applicable): N/A
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Receiving records for the inspection and maintenance of private and public GI/LID structures will create a necessary emphasis on their operation and maintenance. This requirement also creates the need for property owners to review the City's GI/LID program.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Receiving records for the inspection and maintenance of private and public GI/LID structures will reflect the effectiveness of this BMP.

Pollution Prevention/Good Housekeeping for Municipal Operations

40 CFR Part 122.34(b)(6) Requirement: The permittee must develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Using training materials available from the USEPA and other organizations as guidance, the permittee must, as a part of this program, include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.

A. Best Management Practice (BMP) #1

1. Description of BMP: MS4 Control Structure Inventory and Map - The inventory and map includes catch basins, ditches, detention/retention ponds and storm drain lines. The City is sectioned into 5 geographical areas in order to schedule inspections. The schedule is set so that all of the MS4 is inspected within a 5-year period.

2. Measurable goal(s): Annually update the inventory and map of structures to include the minimum list of required structures (catch basins, ditches, detention/retention ponds and storm drain lines).

3. Documentation to be submitted with each annual report: An updated map and inventory of the MS4 structures will be provided in each annual report. The number of each type of MS4 structure added during the reporting period and the total number of each type of structure will be submitted in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Identifies and locates all MS4 control structures within the City that will require inspection and possible maintenance.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The inventory will

assist in identifying maintenance needs that, when addressed, improve the MS4's functioning and reduce erosion or pollutants.

B. BMP #2

1. Description of BMP: MS4 Inspection Program - Conduct annual inspections of the MS4 control structures so that 100% of the inventoried structures are inspected within a 5-year period.

2. Measurable goal(s): Inspect the inventoried MS4 structures located within the scheduled geographical area each year, along with any additional inspections needed to complete all inspections of the MS4 within a 5-year period.

3. Documentation to be submitted with each annual report: Inspection data from the reporting period will be presented in a spreadsheet generated from the data management system (GIS database) and will be provided in that year's annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

6. Rationale for choosing BMP and setting measurable goal(s): Performing inspections of all MS4 structures helps to identify maintenance needs for the proper operation of the MS4 system.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Inspections of the MS4 structures results in the proper operation of the MS4 system, reducing the amount of pollution to the stormwater system. The completion of scheduled inspections of the MS4 per the Stormwater Management Program will demonstrate the effectiveness of this BMP.

C. BMP #3

1. Description of BMP: MS4 Maintenance Program - Provide maintenance to the MS4 control structures as needed as determined by the results of the Inspection Program.

2. Measurable goal(s): Maintain all MS4 structures as needed and to the maximum extent practicable annually.

3. Documentation to be submitted with each annual report: The number of each type of structure maintained annually, as well as work orders for the maintenance activities, will be provided in that year's annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): As needed
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

6. Rationale for choosing BMP and setting measurable goal(s): Maintenance is required for long-term, successful operation of the MS4.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Maintenance will improve operation of the MS4 structures and should reduce erosion and pollution loads entering the stormwater drainage system.

D. BMP #4

1. Description of BMP: Street and Parking Lot Cleaning - The City's Public Works Department performs its street and parking lot cleaning requirement by having a minimum of 1 mile of streets swept annually. Street sweeping is performed through a contracted company.

2. Measurable goal(s): The City conducts street sweeping on at least 1 mile of publicly-owned streets annually.

3. Documentation to be submitted with each annual report: The number of miles swept will be tracked through contractor work records and will be provided in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Public Works Department

6. Rationale for choosing BMP and setting measurable goal(s): Street sweeping reduces the amount of solid waste and pollutants in stormwater runoff from streets.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The removal of waste from streets reduces the amount of pollutants entering the stormwater system.

E. BMP #5

1. Description of BMP: Employee Training – The Public Works Department conducts at least one training session for City employees involved in MS4 activities each year. Training topics focus on pollution prevention during performance of municipal activities and are based on training materials provided by the EPD and/or professional organizations associated with stormwater regulation and management.

2. Measurable goal(s): Conduct at least one a training session annually and provide documentation of the educational activity in each annual report.

3. Documentation to be submitted with each annual report: Sign-in sheets and the materials reviewed will be provided in each annual report, along with the date and time of the training.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

5. Person (position) responsible for overall management and implementation of the BMP: Public Works Department

6. Rationale for choosing BMP and setting measurable goal(s): Training helps to make employees more aware of the potential water quality impacts their job actions may cause, so that they can take steps to prevent them.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Directing training at job activities and pollution concerns should help reduce pollutant impacts.

F. BMP #6

1. Description of BMP: MS4 Waste Disposal - All waste and debris removed from the MS4 will be disposed of such that the waste does not re-enter the MS4 or cause pollution elsewhere. The waste is collected from curb lines during street sweeping and other MS4 maintenance activities.

2. Measurable goal(s): All waste removed from the MS4 will be properly disposed of in locally-available landfills or similar. Waste will be disposed of in such a way that it does not re-enter the MS4 or cause pollution elsewhere.

3. Documentation to be submitted with each annual report: Invoices for MS4 waste disposal activities will be provided in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Ongoing
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

6. Rationale for choosing BMP and setting measurable goal(s): This BMP provides for the proper disposal of waste generated from stormwater management activities and prevents the waste from re-entering the MS4.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: The volume of debris removed from the system will demonstrate this BMP's effectiveness.

G. BMP #7

1. Description of BMP: New Flood Management Projects - The Community Development Department reviews all submitted development plans to determine compliance with the water quality requirements. All plans are reviewed in accordance with the latest edition of the Georgia Stormwater Management Manual (GSMM).

2. Measurable goal(s): All new flood management projects will be reviewed using the GSMM and evaluated for water quality benefits at the design stage.

3. Documentation to be submitted with each annual report: The number of plans reviewed during the reporting period where flood management projects were assessed for water quality impacts will be provided in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): No
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Ongoing
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Community Development Department

6. Rationale for choosing BMP and setting measurable goal(s): Assessing new flood management projects for water quality improvements creates the opportunity to consider the inclusion of water quality structures.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Any installation of water quality measures will have a reduction in TSS per the design standards.

H. BMP #8

1. Description of BMP: Existing Flood Management Projects – At least one existing, City-owned stormwater management facility is assessed annually for potential water quality retrofits. The structure-specific inspection form from the latest version of the GSMM is used to determine if a pond is meeting water quality standards. The retrofits to be considered include BMP practices recommended in the latest version of the GSMM, such as adding a forebay, increasing pond depth and adding a micropool. Retrofits to be considered will be those that the needs and constraints of the site.

2. Measurable goal(s): ~~Assess existing publicly-owned flood management projects for potential retrofits that will address water quality impacts so that 100% are assessed within a 5-year period.~~ Assess at least one existing publicly-owned flood management project annually for potential retrofits that will address water quality impacts.

3. Documentation to be submitted with each annual report: Records for any assessments conducted or retrofitting activities performed during the reporting period will be provided in that year's annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): 2017
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

6. Rationale for choosing BMP and setting measurable goal(s): Assessing existing public flood management projects for possible retrofits provides an opportunity to improve the water quality of stormwater runoff.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Any retrofit installed will improve water quality and reduce pollution.

I. BMP #9

1. Description of BMP: Municipal Facilities – Annually update an inventory of municipal facilities with the potential to cause pollution to the MS4 (e.g., parking lot, dumpsters, City vehicles/equipment storage at City Hall) and inspect all inventoried facilities within a 5-year period.

2. Measurable goal(s): Annually update the inventory of Municipal Facilities within the City that have the potential to cause pollution to the MS4. Inspect all facilities by the end of a 5-year period, with a minimum of 5% being inspected annually.

3. Documentation to be submitted with each annual report: An updated inventory of municipal facilities and inspection records from the reporting period will be provided in each annual report.

4. Schedule:

    a. Interim milestone dates (if applicable): N/A
    b. Implementation date (if applicable): N/A
    c. Frequency of actions (if applicable): Annually
    d. Month/Year of each action (if applicable): By December

5. Person (position) responsible for overall management and implementation of the BMP: Stormwater Utility Manager

6. Rationale for choosing BMP and setting measurable goal(s): Identifying municipal facilities that can pollute stormwater make it possible to schedule inspections of them and encourages practices that are aimed at reducing or eliminating pollutants.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: Pollution will be reduced if pollutant sources or improper practices are identified and corrected. Conducting inspections of municipal facilities accomplishes this.

Appendix

Enforcement Response Plan

1. The MS4 must develop and implement an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Storm Water Management Program. The ERP must be completed and submitted with the second annual report following permit issuance, February 15, 2015.

   Final completion date: December 31, 2014
   Date of submittal to EPD: February 15, 2015

2. In accordance with Part 4.3 of the NPDES Permit, the ERP must include escalating enforcement responses for repeat and continuing violations. At a minimum, the ERP must address the following categories (refer to Part 4.3 of the NPDES Permit for more detail):
   - Names of ordinances and citations;
   - Types of enforcement mechanisms;
   - Description of the use of these enforcement mechanisms;
   - Time frames; and
   - Description of the tracking and reporting mechanism.

NOTE: Upon completion, the ERP will be included as Appendix A of the SWMP.

Appendix

Impaired Waters

1. Population at the time of designation: 46,300

   If the population is less than 10,000, then see items #2 and #3 below.

   If the population exceeds 10,000, then see items #4 and #5 below.

2. If the population is less than 10,000, then the MS4 must develop an Impaired Waters Plan (see Part 4.4.1 of the NPDES Permit) including:
   - A list of impaired waters and the pollutant(s) of concern;
   - A map showing the location of the impaired waters and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters;
   - BMPs that will be implemented to address each pollutant of concern; and
   - A schedule for implementing the BMPs.

3. The Impaired Waters Plan must be submitted with the annual report due February 15, 2015.

   Final completion date/date of submittal to EPD: N/A

4. If the population exceeds 10,000, then the MS4 must develop an Impaired Waters Plan/Monitoring and Implementation Plan (see Part 4.4.2 of the NPDES Permit) including:
   - A list of impaired waters and the pollutant(s) of concern.
   - A Monitoring and Implementation Plan, that includes:
     a. Sample location;
     b. Sample type, frequency, and seasonal considerations;
     c. Monitoring implementation schedule;
     d. A map showing the location of the impaired waters and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters or a schedule for confirming those outfalls; and
     e. Description of proposed BMPs.
   - Description of the method used to annually assess data trends for each pollutant of concern.

5. The Impaired Waters Plan/Monitoring and Implementation Plan must be submitted with the annual report due February 15, 2015.

   Final completion date/date of submittal to EPD: Dec. 31, 2014/Feb. 15, 2015

NOTE: Upon completion, the Impaired Waters Plan will be included as Appendix B of the SWMP.