MILTON

EST 2006

2017-2022

Storm Water Management Plan

Prepared for

City of Milton Public Works

2006 Heritage Walk

Milton, GA 30004

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Storm Water Management Program
City of Milton, GA

June 4, 2018

Revised: May 31, 2019

Revised: June 17, 2019

Revised: July 15, 2019

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 Milton, Georgia

B. Name of responsible official: Sara Leaders
Title: Public Works Director
Mailing Address: 2006 Heritage Walk
City: Milton State: GA Zip Code: 30004
Telephone Number: 678-242-2500

C. Designated stormwater management program contact:
Name: Ken Kagy
Title: City Engineer
Mailing Address: 2006 Heritage Walk
City: Milton State: GA Zip Code: 30004
Telephone Number: 678-242-2500
Email Address: Ken.Kagy@cityofmiltonga.us

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
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E. Post-Construction Stormwater Management in New Development and Redevelopment
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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: Sara Leaders Date: 5/31/2019

Signature:  Title: Public Works Director

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.

See Table 4.2.1(a) of the Permit

A. Best Management Practice (BMP) #1

1. Target audience: General Public

2. Description of BMP: Pamphlet Distribution – 100 pamphlets and fliers covering stormwater pollution topics will be placed 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 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.

3. Measurable goal(s): 100 pamphlets and/or fliers covering stormwater pollution topics will be placed at 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) 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: Conservation Project 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 number of pamphlets picked up reflects increased community awareness.

B. BMP #2

1. Target audience: General Public

2. Description of BMP: City Website – The City will update the Stormwater Management webpage on the City's website annually.

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 with 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): Over time, the volume of traffic on the City's Stormwater Management webpage allows the City to see any fluctuations in public interest. This can reflect how knowledgeable residents are regarding the operation and regulation of 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: Traffic on the City's Stormwater Management webpage demonstrates public interest in stormwater topics.

C. BMP #3

1. Target audience: General Public

2. Description of BMP: Presentations to Government Officials – The Public Works Director and/or a City staff member involved in MS4 activities will provide updates on local stormwater issues to government officials during at least one City Council meeting annually.

3. Measurable goal(s): One presentation covering relevant stormwater topics and issues will be given to government officials each year.

4. Documentation to be submitted with each annual report: Minutes of the City Council meeting where updates are provided to City Council members 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: Public Works Director

7. Rationale for choosing BMP and setting measurable goal(s): Updating the local governing body about current stormwater topics, issues and solutions empowers community leaders to make informed policy decisions concerning stormwater best management practices.

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: Communication with government officials about local stormwater issues demonstrates the BMP's effectiveness.

D. BMP #4

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.

Public Involvement/Participation

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

See Table 4.2.2 (a) of the Permit

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 100 storm drains marked annually. The City will provide volunteers with the markers, installation materials and maps of the structures to be marked. Volunteers will be asked to sign their names on the maps they are given. As structures are marked, volunteers will check off those structures on the provided maps. Upon completion, volunteers will return the signed and 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 listing volunteers with total number of markers installed will be returned for each event 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: Conservation Project Manager

7. Rationale for choosing BMP and setting measurable goal(s): Marking storm drains raises awareness of stream health and pollution sources.

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: Public participation in this activity will demonstrate the effectiveness of this BMP.

B. BMP #2

1. Target audience/stakeholder group: General Public

2. Description of BMP: Stream Clean-up – The City's Conservation Project Manager oversees the organization of at least one stream clean-up event annually and 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 Manager is responsible for providing information to potential volunteers, volunteer registration and final site selection. 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): One stream clean-up event will be held each 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: Conservation Project Manager

7. Rationale for choosing BMP and setting measurable goal(s): Provides public education in stream health and involvement in stream 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: Public participation in this activity will demonstrate the effectiveness of this BMP.

C. BMP #3

1. Target audience: General Public

2. Description of BMP: Adopt-a-Road Program – The Adopt-a-Road Program is offered by the City as a way for citizens to get involved in the community and reduce stormwater pollution. Volunteers can register through the City's website and coordinate with the City Conservation Project Manager to schedule supply pick-up. The City also purchases signs to be placed along the adopted section of road, with the group's name on it. As of 2018, 37 road segments have been adopted within the City of Milton.

3. Measurable goal(s): All debris collected as part of the City's Adopt-a-Road Program will be disposed of so that waste will not re-enter the MS4 or become a source of pollution elsewhere.

4. Documentation to be submitted with each annual report: The list of roads included in the Adopt-a-Road Program and the number of litter bags collected as part of the Program 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: Conservation Project Manager

7. Rationale for choosing BMP and setting measurable goal(s): The Adopt-a-Road program provides a flexible way for citizens to get involved in the community and reduce 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: The availability of this program to the public will reflect the effectiveness of the BMP.

D. BMP #4

1. Target audience: General Public

2. Description of BMP: Pet Waste Stations – Pet waste stations are installed in the City's parks that allow dogs in order to encourage proper disposal of domestic animal waste. The City's maintenance crews monitor the use of these stations and perform maintenance (restocking bags, emptying waste, etc.) during other weekly maintenance work in the parks. Currently, 5 of the City's parks have at least one pet waste station. There are a total of 10 stations, with more stations installed at larger facilities. The stations are located along walkways and park entrances. Steps for installing a new station are as follows: 1) Identify need; 2) Order product; and 3) Install product at identified location.

3. Measurable goal(s): Maintain and restock all City-owned pet waste stations as needed during weekly maintenance activities.

4. Documentation to be submitted with each annual report: Invoices for the total number of bag replacements at pet waste stations and list of number of bags in inventory 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): Ongoing
    d. Month/Year of each action (if applicable): N/A

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

7. Rationale for choosing BMP and setting measurable goal(s): Pet waste stations encourage proper disposal of pet waste while also letting the public know what is expected to be done with their pet's waste. Pet waste can be a prominent contributor to runoff pollution, especially in residential/suburban areas. Promoting proper disposal will help to benefit stream health and remind the public that their actions effect the environment.

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 availability of bags at pet waste stations in public areas commonly frequented by domestic animals and their owners will reflect the effectiveness of the BMP.

Illicit Discharge Detection and Elimination

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

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

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

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

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

A. BMP #1

1. Description of BMP: Legal Authority – Code of Ordinances Chapter 58, Article III, Division 2 – Illicit Discharge and Illegal Connection.

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: Public Works Director

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. Finding no illegal connections or illicit discharges will also reflect the effectiveness of the BMP and program.

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 within the IT Department in coordination with the Community Development 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: IT Department Head

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. The number of added or removed outfalls will be reported annually along with the total.

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, then these 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 – Implement the City's plan for dry weather screening of outfalls, investigation of suspected illicit discharges and elimination of identified illicit discharges per the geographical zone schedule: Zone 4 (2018); Zone 5 (2019); Zone 1 (2020); Zone 2 (2021); Zone 3 (2022).

2. Measurable goal(s): Perform dry weather screening of all outfalls within the scheduled geographical area each year. Conduct dry weather screenings according to steps and methods detailed in the attached document (folder C-3 IDDE Plan). Trace and eliminate all dry weather flows as soon as they are discovered.

3. Documentation to be submitted with each annual report: All outfall inspection reports performed during the reporting year will be provided in each annual report. Documentation of any source tracing and elimination activities conducted will also be provided in each 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: City Engineer

6. Rationale for choosing BMP and setting measurable goal(s): Dry weather screenings are useful in identifying illicit discharges. The annual screening schedule will allow for all outfalls to be inspected over the 5-year permit cycle.

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 – Place informational material on illegal discharge prevention 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): 100 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) 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: Conservation Project Manager

6. Rationale for choosing BMP and setting measurable goal(s): Distributing educational materials related to the negative impact 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: The distribution of pamphlets reflects increased community awareness.

E. BMP #5

1. Description of BMP: Complaint Response – Complaints are submitted via the City's website, by phone or through the City's mobile app. 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 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: Code Enforcement

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 (Chapter 20, Article VI) to control erosion and a Litter Ordinance (Chapter 42, Article II) 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 ordinances, the updated versions 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 Director

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 erosion and site-generated waste will demonstrate this BMP's effectiveness.

B. BMP #2

1. Description of BMP: Site Plan Review Procedures – The City of Milton (LIA) requires a land-disturbance permit for any construction activity that disturbs more than 5,000 square feet. Applications for LDP's are submitted to the Community Development Department for review. The submission must include three copies of the ES&C plans, a physical address of the property owner and certification that the designer (or their designee) visited the site before creating the submitted plans. Permit applications are approved or denied no later than 45 days after plan submittal. The Erosion Sedimentation and Pollution Control Plan for the project must be approved by the City and/or, if necessary, the district before an LDP is issued. If a plan needs to be reviewed by the district, the district may approve or disapprove the plan within 35 days of receipt, forwarding its decision to the City. If a decision is not made within 35 days, the plan is considered approved by the district (Sec. 20-591 & Sec. 20-593).

2. Measurable goal(s): The City's Site Plan Review process 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 for an LDP will be catalogued and reported annually.

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 Director

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: Successful implementation of a Site Plan Review Program in accordance with the intent of Code VI, Division 2 will demonstrate effectiveness of this BMP.

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 Code Enforcement personnel certified in the fundamentals of E&SC. Inspections are conducted following the Field Manual for Erosion and Sediment Control in Georgia ("Green Book"). Inspection and enforcement actions are described in the Code of Ordinances Chapter 20, Article VI, Division 2 – Inspection and Enforcement. The City's Community Development Department conducts its site inspections at the beginning of a project, weekly during periods of active construction, after every 0.5 inch rainfall event and upon project completion (final inspection). Inspections are documented in reports, which include the following information: date and location; site-specific measurements and dimensions; compliance status; any deviations from approved site plan or specifications; and any violations. If violations are found, the applicant is notified in writing about the issue and advised on the corrective measures needed (Sec. 20-338).

2. Measurable goal(s): All active construction sites will be inspected during construction activity and will receive a final inspection upon project completion.

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 Director

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: Successful implementation of an Inspection Program in accordance with the Code of

Ordinances Chapter 20, Article VI, Division 2 will demonstrate effectiveness of this BMP.

D. BMP #4

1. Description of BMP: Enforcement Procedures - Implement enforcement procedures for E&SC violations as outlined in the Code of Ordinances Chapter 20, Article VI, Division 2 – Inspection and Enforcement and in the 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 documented and provided in the annual report, including 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): Ongoing

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

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 will demonstrate the effectiveness of this BMP.

E. BMP #5

1. Description of BMP: Complaint Response – Complaints are submitted via the City's website, by phone or through the City's mobile app. 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: Code Enforcement

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 will maintain required certifications and renew them as needed annually.

3. Documentation to be submitted with each annual report: MS4 staff certifications will be provided in each annual report in the form of print-outs from the GSWCC website.

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 Director

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 demonstrate effectiveness of this BMP.

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 20, Article IV of the City of Milton, Georgia Code of Ordinances.

2. Measurable goal(s): The Stormwater Management Ordinance will be evaluated on an annual basis. If the ordinance is revised, a copy of the updated ordinance will be submitted with the following annual report.

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): 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: City Engineer

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 demonstrate the effectiveness of this BMP.

B. BMP #2

1. Description of BMP: Inventory - The City maintains an inventory of post-construction stormwater management structures (e.g., detention/retention ponds, water quality vaults) that are City-owned ponds, privately-owned ponds accepted (installed) with legal public access after December 9, 2008, and ponds owned by other public entities. The inventory consists of information on the number and type of structures and the ownership of the structure (publicly-owned, privately-owned).

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 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: IT Department Head

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 - Post-construction stormwater management structures included in the inventory will be inspected a minimum of once every 5 years scheduled based on which of the 5 inspection zones the structures are located in. Privately-owned facilities included in the inventory will be inspected by the City based on the geographical area schedule. If deficiencies are found, the property owner will receive a letter of deficiency outlining the problematic conditions. Deficiencies will be fixed as soon as practicable or as funding is available. The appropriate inspection form from the latest GSMM will be used when upon inspection of each post-construction stormwater management facility.

2. Measurable goal(s): One geographical area will be inspected each year such that all structures are inspected within the 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: City Engineer

6. Rationale for choosing BMP and setting measurable goal(s): Inspections will identify maintenance needs & will ensure proper operation 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: 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 accepted (installed) with agreements after December 9, 2008, 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 that are not City-owned, the City will send a letter to the owner outlining the problematic conditions within 90 days of the inspection. 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): Maintenance will be carried out on City-owned ponds as soon as practicable with available funding. Owners of other ponds will be notified of any deficiencies within 90 days of the 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. 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: City Engineer

6. Rationale for choosing BMP and setting measurable goal(s): Maintenance is a vital part in the long term proper 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: City Engineer

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 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: City Engineer

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 perform inspections on all structures in the GI/LID inventory such that all are inspected within a 5-year period. Inspections will be completed in accordance with the schedule outlined in the GI/LID program to be submitted February 15, 2020. Maintenance will occur as needed on City-owned GI/LID structures. Privately-owned non-residential GI/LID structures and those publicly-owned by other entities will be maintained by the owner.

2. Measurable goal(s): Conduct annual inspections on all GI/LID structures in the inventory 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 along with any letters sent to private non-residential or other public owners regarding necessary maintenance of their structures.

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: City Engineer

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 split 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: City Engineer

6. Rationale for choosing BMP and setting measurable goal(s): Identifies and locates all MS4 control structures within the community 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 scheduling inspections, during which any maintenance needs can

be addressed. In this way, maintaining the inventory helps to improve function of and reduce the volume of pollutants entering the MS4 and demonstrates the effectiveness of this BMP.

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 during a 5-year period.

2. Measurable goal(s): Inspect the inventoried MS4 structures located within the scheduled geographical area(s) each year, along with any additional inspections needed to complete all inspections of the MS4 at the end of the 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: City Engineer

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: Performing inspections on MS4 structures helps to identify any maintenance that needs to be performed to reduce the amount of pollution entering the MS4. The implementation of the Inspections Program demonstrates 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: Work orders for maintenance activities on MS4 structures 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): As needed
    d. Month/Year of each action (if applicable): N/A

5. Person (position) responsible for overall management and implementation of the BMP: City Engineer

6. Rationale for choosing BMP and setting measurable goal(s): Maintenance is required for long term successful operation of MS4 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: 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 - Street cleaning is performed through litter removal activities associated with the Adopt-a-Road Program (see full description for BMP #B-3).

2. Measurable goal(s): The number of litter bags removed annually will be tracked through bag collection work orders.

3. Documentation to be submitted with each annual report: The number of litter bags removed will be tracked through work orders. The total number of litter bags removed will be provided in each annual report. The updated map of streets that are part of Milton's Adopt-a-Road Program will also be included 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: Conservation Project Manager

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 will conduct a minimum of one training session per year for City employees involved in MS4 activities. Training topics will be focused on pollution prevention in municipal activities and will be based on training materials provided by the EPD and/or professional organizations associated with stormwater management and regulations.

2. Measurable goal(s): Conduct a training session at least once annually.

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 Director

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, allowing employees to make better decisions that 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: Successful implementation of at least one training session per year will demonstrate the effectiveness of this BMP.

F. BMP #6

1. Description of BMP: MS4 Waste Disposal – The City collects waste from the MS4 through its Adopt-a-Road Program and through routine maintenance of the MS4 system. Waste collected as part of the Adopt-a-Road Program is disposed of using existing residential and commercial trash disposal systems (e.g., home trash receptacles, private dumpsters, etc.). MS4 waste removed during routine maintenance activities is tracked through the City's electronic work order system.

2. Measurable goal(s): All waste and debris removed from the MS4 will be tracked by the number of bags filled and disposed of as part of the City's Adopt-a-Road Program and its routine MS4 maintenance activities.

3. Documentation to be submitted with each annual report: The number of litter bags collected as part of the Adopt-a-Road Program will be provided in each annual report, along with spreadsheet of work orders and associated waste bag quantities.

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: Conservation Project Manager

6. Rationale for choosing BMP and setting measurable goal(s): To ensure wastes resulting from stormwater management activities are disposed of appropriately and prevented 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 assesses all newly-proposed flood management projects for water quality impacts during the design phase using the latest edition of the Georgia Stormwater Management Manual (GSMM) as required by the Stormwater Management Ordinance.

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 where water quality impacts have been assessed 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 Director

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 – Assessments for potential water quality retrofits on existing, City-owned ponds will take place alongside the scheduled detention pond inspections performed as part of BMP #F-2. The structure-specific inspection form from the latest version of the GSMM is used to determine if a pond is meeting water quality standards. If a pond does not meet GSMM water quality standards, pond retrofits will be considered to meet the current water quality performance standard and improvements to City-owned ponds will be programed as funding is available.

2. Measurable goal(s): Assess existing City-owned flood management projects for potential retrofits that will address water quality impacts so that 100% are assessed within a 5-year period. The retrofits to be considered include BMP practices recommended in the latest version of the GSMM (bioretention, gravity (oil-grit) separators, infiltration practices, proprietary devices, regenerative stormwater conveyance systems, sand filters, site reforestation/revegetation, stormwater ponds and stormwater wetlands) and that meet the needs and constraints of the site.

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: City Engineer

6. Rationale for choosing BMP and setting measurable goal(s): 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: Successful review of at least one existing flood management project per year will demonstrate the effectiveness of this BMP.

I. BMP #9

1. Description of BMP: Municipal Facilities – The City keeps an updated inventory of municipal facilities that have the potential to cause pollution to the MS4 (e.g., parking lot, dumpsters, City vehicles/equipment storage at City Hall). The City inspects 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 100% of the facilities within 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: City Engineer

6. Rationale for choosing BMP and setting measurable goal(s): Identifying facilities and practices that may lead to pollution of stormwater enables inspection and practices aimed at reducing or eliminating the pollutant to take place.

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 practices are found and are corrected. Conducting inspections of municipal facilities will demonstrate the effectiveness of this BMP.

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: February 18, 2015
   Date of submittal to EPD: February 18, 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 based on the 2010 U.S. Census: 32,661

   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: Feb. 1, 2015/Feb.15, 2015

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: Feb. 1, 2015/Feb.15, 2015

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