

2023 – 2027
STORMWATER MANAGEMENT
PROGRAM (SWMP)



4362 Peachtree Road, N.E.
Brookhaven, Georgia 30319

NPDES Permit No: GAG610000

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

Prepared By:
THE CITY OF BROOKHAVEN
Public Works Department
Stormwater Division

Initial Submission: June 4, 2023
Revision Dates:

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2023 – 2027 STORMWATER MANAGEMENT PROGRAM (SWMP)

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General Information for Submitting a SWMP

- Your Stormwater Management Program (SWMP) must be a comprehensive document containing all the necessary components. The SWMP must include the most recent version of all of the required supporting documents. These supporting documents must be submitted on a flash drive or CD. Ensure that the files can be opened and read by EPD. In rare cases, EPD will accept hard copies of documents. Ensure that you submit all of the necessary components, including copies of the latest versions of the following:
 - 1) Adopted stormwater ordinances (Illicit Discharge, Erosion and Sedimentation, and Post-Construction). If you are located within the Metropolitan North Georgia Planning District, then your SWMP must also include District ordinances (Floodplain, Litter, Stream Buffer);
 - 2) Standard Operating Procedures (e.g. dry weather screening procedures, construction site inspection procedures, street sweeping procedures);
 - 3) Blank copies of forms to be used to implement the SWMP, including inspection forms;
 - 4) Signed Memorandum of Agreements; and
 - 5) Maps and inventories.

A bulleted list of the documents to be attached to the SWMP is included on each BMP page. This list is only to assist the permittee as a reminder and is not a definitive list. The permittee may determine some of the listed documents do not apply or that additional documents should be provided.

- For some BMPs, the NPDES Permit requires the submittal of procedures. These procedures may be described in the “Description of BMP” section of each BMP page, if they are not lengthy, or included as a separate attachment to the SWMP.
- The NPDES Permit contains tables listing the various BMPs. The MS4 is required to set a measurable goal for each BMP. In some cases, the Permit establishes the goal (e.g. inspect 100% of the structures within a 5-year period), while in other cases the MS4 must set a specific measurable goal. Ensure that each measurable goal is numeric and trackable.
- The NPDES Permit specifies that the MS4 must provide documentation of each activity implemented. Each BMP must specify the documentation to be submitted with each annual report (e.g. completed inspection forms, work orders, etc.). In some cases, the Permit specifies the documentation to be submitted (e.g. maps and inventories). In other cases, the MS4 will have to establish the documentation to be submitted. Ensure that each BMP spells out the specific documentation to be submitted with each annual report in the section titled “Documentation to be submitted with each Annual Report”.

STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Stormwater 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 Brookhaven
- B. Name of responsible official: Don Sherrill, P.E.
Title: Director of Public Works
Mailing Address: 4362 Peachtree Rd
City: Brookhaven State: GA Zip Code: _____
Telephone Number: (404) 637-0500
Email Address: Don.Sherrill@brookhavenga.gov
- C. Designated stormwater management program contact
Name: Tom Roberts, P.E.
Title: Deputy Public Works Director
Mailing address: 4362 Peachtree Rd
City: Brookhaven State: GA Zip Code: _____
Telephone Number: (404) 637-0500
Email address: Tom.Roberts@brookhavenga.gov
- D. Provide the river basin(s) to which your MS4 discharges: Chattahoochee River
- E. Provide the latitude and longitude of the MS4 center (e.g. City Hall, County offices, MS4 mailing address) using Global Positioning System (GPS) –WG 84:
Latitude: 33.870659 Longitude: -84.333946

2. Sharing Responsibility

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

Control Measure or BMP:

1. Name of entity _____

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

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

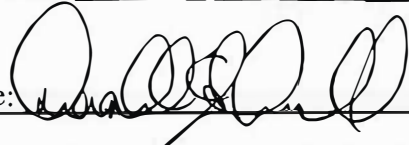
3. **Minimum Control Measures and Appendices**

- 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 A – Enforcement Response Plan
- H. Appendix B – 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: Donald C. Sherrill, PE Date: June 4, 2023

Signature:  Title: Public Works Director

Storm Water Management Program

Public Education and Outreach on Storm Water Impacts

Appendix A

Table 4.2.1(a) of the Permit

A. BMP A-1 [4.2.1]: Brochures In Public Places

1. Target audience: Citizens and General Public

2. Description of BMP: To inform individuals and households about ways to reduce stormwater runoff pollution by distributing pamphlets. Ten (10) copies of each educational pamphlet type will be routinely stocked at two locations: City Hall and City Hall Council Chambers. Pamphlets will be made available at volunteer events throughout the year. The pamphlets are available online at this link: <https://www.brookhavenga.gov/publicworks/page/stormwater-public-service-announcements>

Topics of the education brochures include the following: litter control, illicit discharges, household hazardous waste disposal, Fats, Oils and Grease (FOG), A Guide to Swimming Pool Discharges, Flood Preparation and Safety, Mosquito Control, and Stream Buffer Management.

A spreadsheet tracks the education pamphlet distribution activity. The pamphlet supplies are checked regularly, restocked as necessary, and restocking dates are noted in the spreadsheet.

3. Measurable goal(s): 10 copies of Each educational pamphlet type are continually stocked at two locations: City Hall and City Hall Council Chambers. Pamphlets will be made available at volunteer events throughout the year. The pamphlets are available online at this link: <https://www.brookhavenga.gov/publicworks/page/stormwater-public-service-announcements>

4. Documentation to be submitted with each Annual Report: A spreadsheet listing the name of each brochure, the number placed, the number re-stocked, and the number picked up.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing

- c. Frequency of actions (if applicable): Annually
- d. Month/Year of each action (if applicable): By December 31
- 6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Communications, Community Development
- 7. Rationale for choosing BMP and setting measurable goal(s): Educate the citizens about importance of stormwater pollution prevention and that they can do to help.

- 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 the pamphlets would reflect the increase in awareness of the community.

B. BMP A-2 [4.2.1]: City Stormwater Website

1. Target audience: General citizens and employers within the City of Brookhaven

2. Description of BMP: Use City website media to educate citizens about stormwater runoff pollution and other issues concerning stormwater.

3. Measurable goal(s): Publish two articles per year onto the website. The City is considering adding a counter to the website.

4. Documentation to be submitted with each Annual Report: Copies of Articles and website counter date will be reported when available.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Communications

7. Rationale for choosing BMP and setting measurable goal(s): To inform the citizens and employers about important stormwater 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 involvement of the community in the stormwater program will reflect the effectiveness of the BMP

Note: For those permittees with a population of less than 10,000, the MS4 should implement at least 2 BMPs. For those permittees with a population greater than 10,000, the SWMP must include at least four BMPs. For each additional BMP, you should attach an additional BMP page in the SWMP.

C. BMP A-3 [4.2.1]: Present Stormwater Topics to School-Age Children

1. Target audience: School Age Children and Teachers
2. Description of BMP: Annually, the City's Stormwater Manager will prepare, present, and lead a discussion on at least one in-school stormwater related topic to school-age children and their teachers or public event geared towards children. As an example, the Stormwater Manager may use an interactive EnviroScape watershed and non-point source model to lead a discussion on a variety of stormwater related topics.
3. Measurable goal(s): Hold one in-school stormwater presentation and discussion event annually.
4. Documentation to be submitted with each Annual Report: Submit at least one photograph per event documenting the presentation and materials used, a brief summary of the presentation(s) given, and the name and address of the school.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
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): Common goals between the DeKalb County School Board and the City's MS4 program create a synergistic, and thus, a sustainable educational relationship. The school-age children and their teachers are captive audiences while at school, so there is a predictable minimum number of audience members for each event. Children typically welcome non-school related and hands on-topics during the day, so the audience should be highly engaged in the subject matter. It is also likely they will share the discussion topics with their siblings and parents at the end of the day.

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: An indirect indicator will be unsolicited repeat invitations from schools where the discussions were held. A second indirect measure of success will be unsolicited invitations from schools where presentations and discussion have not been previously given. Social marketing campaigns featured in school have a history of being effective in changing behaviors, e.g. Stop Smoking campaigns.
-

D. BMP A-4 [4.2.1]: Social Media

1. Target audience: General Public
2. Description of BMP: The City has developed and implements a program that utilizes social media, (FaceBook, Twitter, Instagram, etc.) to inform citizens of stormwater events and other stormwater related topics.
3. Measurable goal(s): Use multiple social media platforms to disseminate important and educational information regarding local Stormwater. Posts to the City's social media accounts will be made on at least a bi-monthly basis.
4. Documentation to be submitted with each Annual Report: Screenshots of the social media posts or other verifiable documentation will be provided.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Communications
7. Rationale for choosing BMP and setting measurable goal(s): The ubiquitous nature of social media dictates the City will reach many more people using these forms of communication than the City website alone.
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: Feedback from the public on social media will be evidence of this BMPs effectiveness.

Public Involvement/Participation

Appendix B

See Table 4.2.2 (a) of the Permit

A. BMP B-1 [4.2.2]: Storm Drain Marker Program

1. Target audience/stakeholder group: General Public
2. Description of BMP: To get interested residents actively involved in protecting the drainage infrastructure that leads to state waters. Volunteers will bring attention to stormwater runoff issues through their physical presence, markers placed on structures, and handing out information to neighbors via door to door. The City of Brookhaven provides the markers, tools, and materials to affix the markers to stormwater structures. Public Works staff attends and assists the public with this event. The markers placed are surveyed as part of MS4 control structure BMP and this information is stored in the City's GIS database.
3. Measurable goal(s): Hold one storm drain marking event annually.
4. Documentation to be submitted with each Annual Report: Sign in sheet of volunteers and photographs from the event.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development and Communications
7. Rationale for choosing BMP and setting measurable goal(s): To inform the citizens about the effects of dumping pollutants into storm drain structures
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: involvement of the Community in the stormwater program will reflect the effectiveness of the BMP

B. BMP B-2 [4.2.2]: Streamside Clean-up Program

1. Target audience/stakeholder group: Citizens, Home Owner Associations and Employers
2. Description of BMP: The City of Brookhaven will post the event on City Website and contact local groups to recruit volunteers to help cleanup identified streams Criteria for streams selected for cleaning events are based upon public safety, access to/from the streambank, available parking, educational impact, and amount of debris to be removed. The City's Stormwater Manager assists by providing trash bags, gloves, and some small tools.
3. Measurable goal(s): One streamside clean-up event per year where the City will track the number of volunteer as well as the number of bags/or weight of debris removed
4. Documentation to be submitted with each Annual Report: Sign in sheet of the number of volunteers, the number of bags and/or weight of debris removed, copy of advertising materials for the event, and photographs.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Communities Relations
7. Rationale for choosing BMP and setting measurable goal(s): To clean up the streams and educate the citizens on the importance and help them take ownership and be more responsible
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

Note: For those permittees with a population of less than 10,000, the MS4 should implement at least 2 BMPs. For those permittees with a population greater than 10,000, the SWMP

must include at least four BMPs. For each additional BMP, you should attach an additional BMP page in the SWMP.

C. **BMP B-3 [4.2.2]: Pet Waste Stations**

1. Target audience/stakeholder group: Dog Owners
2. Description of BMP: Maintain and restock the existing pet waste stations in City parks. Annually, update the inventory of the existing number of pet waste stations located at City facilities (see Appendix BMP B-3). Add new stations to the inventory as they come online.
3. Measurable goal(s): Annually update the inventory of the number of existing pet waste stations by City facility. Track the total number of bags and/or boxes/rolls of bags replenished by City park each year. Replace the equivalent of 100 bags (1 box/roll) per installed pet waste station.
4. Documentation to be submitted with each Annual Report: An updated inventory of existing pet waste stations at City facilities. A log sheet demonstrating the annual number of rolls/boxes of bags restocked by facility.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Parks and Recreation.
7. Rationale for choosing BMP and setting measurable goal(s): Through bacteriological source tracing, experience has shown that many stream segments that are non-attaining for fecal coliform have canine origins. By providing easy access and disposal of pet waste through the pet waste stations, a significant source of fecal coliforms can be controlled, and over time, removal of this source will result in water quality improvements. This public participation BMP also educates the public through the example of others.
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 pet waste baggies used is a direct indicator of the redirection of the pet/canine waste stream from the ground to collection facilities. Due to the hilly topography of Brookhaven, the distance to State Waters through overland flow or through the

MS4 from most areas is generally short. Thus, removal of pet waste from the ground that could be washed into State Waters will have a positive long-term water quality impact.

D. BMP B-4 [4.2.2]: Recycling Facility or Event

1. Target audience/stakeholder group: General Public

2. Description of BMP: Program supports and expands the capabilities of curb side recycling already in place. The program stages one event per year that involves a hazardous material, (textiles, plastic film; toxic liquids, etc.), that is not included in standard sanitation curb side program. The City partners with DeKalb County's household hazardous waste event held in the Spring and Fall. The City advertises the events in the eBlast and Brookhaven Blast delivered to 4,000 households. The City is reliant on the County's Sanitation Division for tracking participants and the amount recycled. Recycling occurs at DeKalb County's Central Transfer Station at 3720 Leroy Scott Drive, Decatur, GA 30032.

3. Measurable goal(s): Organize one event per year that allows public to recycle something that is a potential hazard to State waters but not currently collected by sanitation department.

4. Documentation to be submitted with each Annual Report: General scope and public notifications used for the event including dates and targeted material. City of Brookhaven coordinates with Dekalb County Stormwater Manager to obtain number of participants, amount recycled, and where the materials are disposed.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31

6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Parks and Recreation and Communications.

7. Rationale for choosing BMP and setting measurable goal(s): Eliminate liter from entering storm system by supporting recycling awareness and providing facilities to make participation easier.

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 use of the recycling facilities will determine effectiveness of the BMP.

Illicit Discharge Detection and Elimination

Appendix C

See Table 4.2.3 (a) of the Permit

A. BMP C-1 [4.2.3]: Legal Authority

1. BMP Title: Legal Authority
2. Description of BMP: Legal Authority is provided by the City of Brookhaven Code of Ordinances Chapter 25, Article VI, Storm Sewer Illicit Discharge and Illegal Connection (IDDE Ordinance). The City has enacted the IDDE Ordinance to ensure that legal authority exists to effectively prohibit non-stormwater discharges into the storm sewer system and implement appropriate enforcement procedures and actions.
3. Measurable goal(s): Review annually and revise if necessary
4. Documentation to be submitted with each Annual Report: If the ordinance is revised during the reporting period, a copy of the adopted ordinance will be submitted with the annual report.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works – Stormwater Utility Manager
7. Rationale for choosing BMP and setting measurable goal(s): To give the City the legal authority to prosecute illicit connections and discharges into the storm sewer system.
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: Effectiveness will be based on the City's ability to remove an illegal connection or illicit discharge from the MS4.

SWMP Attachments:

- Illicit Discharge Detection and Elimination ordinance, showing adoption date

- If you are located within the Metropolitan North Georgia Planning District (District), attach copies of all of the District ordinances, showing the adoption dates, to the SWMP.

B. BMP C-2 [4.2.3]: Update Outfall Map and Inventory

1. BMP Title: Update Outfall Map and Inventory
2. Description of BMP: All MS4 outfalls were previously inventoried and mapped. The City is divided into five geographic outfall zones. Each reporting year, the inventory will be updated in one zone of the City. Where necessary, the inventory and maps will be updated to ensure each outfall in each zone meets the NPDES permit definition of an outfall. All named water bodies will be appropriately labeled on the map(s).
3. Measurable goal(s): Annually update the outfall inventory and map for a complete geographic zone so that over a 5-year period, 100% of the outfalls are re-inventoried and maps updated.
4. Documentation to be submitted with each Annual Report: A copy of the revised map and inventory, showing the outfalls and the names of their receiving streams; and the total number of outfalls added during the reporting period and the total number of outfalls in the MS4.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
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): Identification of all outfalls in the City is an essential for source tracing detected illicit discharges.
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: Identification of a pollution source through use of the map and inventory will be a measure of the BMP's effectiveness. Absence of illegal connections or illicit discharges will also reflect overall effectiveness.

SWMP Attachments:

- Outfall inventory

- Outfall map showing the outfalls and the receiving streams, including stream names

C. BMP C-3 [4.2.3]: IDDE Plan

1. BMP Title: IDDE Plan
2. Description of BMP: The IDDE plan provides the rationale and procedures to execute dry weather screening, source tracing, and source elimination programs. The City has been divided into five sections, and the inspections focus on one zone each reporting year. This approach will ensure 100% of the outfalls are inspected during the life of the permit.
3. Measurable goal(s):
 - a. Conduct dry weather screening (DWS) inspections on 100% of the total outfalls within the 5-year permit.
 - b. Complete all DWS in one of the five designated City zones for each reporting year on a 5-yr rotating basis.
 - c. Eliminate 100% of illicit discharges in outfalls with dry weather flow (DWF) identified through DWS in less than 30 days, or initiate Enforcement Actions which include an approved Corrective Action Plan with milestone dates.
 - d. Initiate source tracing activities for 100% of all identified outfalls with DWF beginning at the time of discovery.
 - e. If immediate source tracing does not affirmatively identify an illicit DWF discharge source, follow the field sampling, analysis, and documentation procedures from the IDDE Plan for all unidentified sources of illicit discharges found through the DWS process.
4. Documentation to be submitted with each Annual Report: The number of outfalls screened during dry weather for the applicable zone. Copies of the annual completed dry weather screening forms and documentation of illicit discharge source tracing, compliance and enforcement activity.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Stormwater Manager
7. Rationale for choosing BMP and setting measurable goal(s): Dry weather screening is a manageable, quickly performed, and effective tool in identifying potential and eliminating confirmed illicit discharges. The selected field water quality parameters are repeatable and effective in helping to identify and document sources of illicit discharges.

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: Elimination of illicit discharges to the MS4 directly and immediately result in a reduction of the point source pollutant loads to Waters of the State and Waters of the U.S.

SWMP Attachments:

- Illicit Discharge Detection and Elimination Plan
- Outfall inspection form - Included in IDDE Plan
- If using an alternate method in place of outfall inspections, the form to document activities - NA
- Form to document stream walks - NA
- Form to document source tracing
- Form to document illicit discharge elimination
- Example table to track outfall inspections over the permit cycle

D. BMP C-4 [4.2.3]: IDDE Education

1. BMP Title: IDDE Education
2. Description of BMP: Copies of an educational brochure will be stocked at two locations: City Hall and City Hall Council Chambers.. The brochures may discuss subjects relevant to illicit discharges and connections to the MS4 and why it is important to eliminate them. Brochures will also be made available at volunteer events during the year.
3. Measurable goal(s): Ten (10) copies of an educational brochure will be stocked at each location annually and distributed at volunteer events. When re-stocking is necessary, the number brochures restocked at each location will be tracked. For events, the number of brochures distributed will be tracked.

4. Documentation to be submitted with each Annual Report: Please refer to BMP A-1. A spreadsheet listing the name of the brochure(s), the number placed and the number re-stocked will be maintained.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Continuous
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development.
7. Rationale for choosing BMP and setting measurable goal(s): Many believe pouring seemingly harmless items into the gutter is ok. Others even think that they may be doing the environmentally conscious thing by putting some items directly into a storm drain, pool water for example. Making as many aware of the definition of an illicit connection or discharge, and how it can harm the environment can change the erroneous view and result in widespread behavioral changes.
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: With education, it would expected that the number of reports of illicit discharges initially rise, leading to a downward trend as education and the consequences of violations become

widespread. Ultimately, there is an expectation in a reduction in the number of detected illicit discharges.

E. BMP C-5 [4.2.3]: IDDE Complaint Response

1. BMP Title: IDDE Complaint Response
2. Description of BMP: The City receives most complaints through its online interactive CitySourced portal, publicly branded as Brookhaven Connect. The citizen reporting system can be accessed through a computer or through the “Brookhaven Connect” iPhone or Android mobile app. Other complaints are received at the City Hall main number, 404-637-0500, where complaints are logged into the CitySourced system by City Staff. Citizens may choose from two complaint types that will trigger same-day response: “Illegal Dumping/Discharge” or “Other Environmental Concern.” Fields are provided to describe the issue, provide the address, upload pictures or sketches, and if registered in the system, the complainant’s name, phone number, and e-mail are attached to the complaint. In this case, when the City updates the comments in the complaint file, the complainant is copied on the email. Throughout the process, emails are sent as status of the complaint, investigation, repair, etc. are updated in the system: Submitted, Received, In-process, Duplicate, Could Not Verify, Not an Issue, Referred to [other Agency] Department, and Closed are the possible status choices. When the Complaint is received, Public Works creates a folder in the Reporting Year’s Annual Report Folder on the CoB’s network server, where the details and data of the investigation are maintained. As the investigation continues, and the source is identified, the violator’s information and City communication with the violator are stored in this location.

Once an illicit discharge or connection has been identified, the procedures of the IDDE plan and Enforcement Response Plan are followed. Once the illicit discharge has been eliminated, the status of the complaint is changed to Closed in CitySourced, and copies of the relevant documents from the system are moved to the investigation file in the Reporting Year’s Annual Report folder.

3. Measurable goal(s): Investigate 100% of complaints within three business days. When an illicit discharge is confirmed, the procedures of the IDDE Plan and ERP will be followed for 100% of confirmed Illicit Discharges.
4. Documentation to be submitted with each Annual Report: A copy of the Reporting Year CitySourced database containing complaints received and their resolution (including date, type and status); and a copy of any enforcement actions taken will be provide in each Annual Report.
5. Schedule:

- a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development.
 7. Rationale for choosing BMP and setting measurable goal(s): To address citizen concerns and eliminate 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: Number of IDDE point sources eliminated.

SWMP Attachments:

- Complaint procedures, including receipt, investigation and enforcement
- Form used to document complaint receipt, handling, and resolution

Construction Site Storm Water Runoff Control

Appendix D

Table 4.2.4 (a) of the Permit

A. BMP D-1 [4.2.4]: Legal Authority

1. BMP Title: Legal Authority
2. Description of BMP: City of Brookhaven adopted an Erosion and Sediment Control ordinance in 2014-2015. The City's Erosion and Sediment Control Ordinance has been revised since December 2016 and is in compliance with the 2015 E&S Act. The ordinance was revised on 8/7/2017 and 3/6/2018.
Interim BMP: A draft revision to the Litter Control ordinance has been submitted to EPD for review. This revised language will be forwarded to City Council for discussion, revision, and/or adoption.
3. Measurable goal(s): The City will review ordinance annually and revise as necessary.
4. Documentation to be submitted with each Annual Report: A copy of any Revised Ordinance to be included in annual report of same year.
5. Schedule:
 - a. Interim milestone dates (if applicable): Additional construction site operator language: No later than the 2020 Annual Report
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development
7. Rationale for choosing BMP and setting measurable goal(s): To control stormwater runoff from new and redeveloped projects. Including water quality and channel protection.
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: Having greater number of LDPs that are in compliance.

SWMP Attachments:

- Erosion and Sedimentation ordinance, showing adoption date. If the required construction waste wording is contained in another ordinance (e.g. litter), then submit that adopted ordinance also.

B. BMP D-2 [4.2.4]: Site Plan Review Procedures

1. BMP Title: Site Plan Review Procedures
2. Description of BMP: The City uses a standardized checklist for construction site plan reviews and permitting of projects. The City has developed site plan review procedures which are attached in the appendix material. The City tracks construction site plans reviewed, approved or denied by the City during the reporting period.
3. Measurable goal(s): Review and track 100% of projects in the City disturbing one acre or more, and all projects with smaller than an acre of disturbed land if they are a part of a bigger development project.
4. Documentation to be submitted with each Annual Report: A list of the site plans received, the number of site plans reviewed, approved or denied during the reporting period.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Community Development, Public Works.
7. Rationale for choosing BMP and setting measurable goal(s): To develop consistence in the review and permitting with minimum standards.
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 BMP will be deemed effective if no land disturbance projects are initiated without first having an appropriate plan in place and implemented to keep construction sites from causing stormwater runoff pollution.

SWMP Attachments:

- Site plan review procedures
- Example plan review forms
- Example plan review tracking log

C. BMP D-3 [4.2.4]: Construction Site Inspection Program

1. BMP Title: Inspection Program
2. Description of BMP: The City developed Construction Site Inspection Procedures; and conducts inspections in accordance with the Construction Site Inspection Procedures and the Manual for Erosion and Sediment Control in Georgia (“Green Book”).
3. Measurable goal(s): Conduct inspections on 100% of the active construction sites annually, including at the beginning of construction, during active construction, and at final stabilization.
4. Documentation to be submitted with each Annual Report: List of active construction sites and any completed inspection reports.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Community Development, Public Works, Code Enforcement
7. 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 to the M.E.P.
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: Inspections should limit the number of permit violations on construction sites.

SWMP Attachments:

- Construction site inspection procedures
- Example inspection forms
- Example site inspection tracking log

D. BMP D-4 [4.2.4]: Enforcement Procedures for Construction Site E & S Violations

1. BMP Title: Enforcement Procedures
2. Description of BMP: Implement enforcement procedures for E&S violations documented at construction sites during the reporting period as described in the ERP required by Part 4.3 of this permit.
3. Measurable goal(s): Ensure enforcement is taken on 100% of violations noted during site inspections.
4. Documentation to be submitted with each Annual Report: Provide documentation of any enforcement actions taken during the reporting period in each annual report, including the number and type (e.g. Notice of Violation, Stop Work Order) and status (e.g. Pending, resolved).
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public works and Community Development
7. Rationale for choosing BMP and setting measurable goal(s): The guidelines of the ERP provide the LIA authority with exact measures to take in case of a violation.
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: We will monitor the reduction of the number of violations.

SWMP Attachments:

- Example enforcement forms or letters (e.g. Stop Work Order, Warning Notice)
- Example enforcement action tracking log

E. BMP D-5 [4.2.4]: Erosion & Sediment Control Complaint Response

1. BMP Title: Complaint Response
2. Description of BMP: The City receives most complaints through its online interactive CitySourced portal, publicly branded as Brookhaven Connect can be accessed through a computer or through the “Brookhaven Connect” iPhone or Android mobile app. Other complaints are received at the City Hall main number, 404-637-0500, where complaints are logged into the CitySourced system by City Staff. The portal has a specific complaint for “Soil and Erosion Violation” that will trigger response: Fields are provided to describe the issue, provide the address, upload pictures or sketches, and if registered in the system, the complainant’s name, phone number, and e-mail are attached to the complaint. In this case, when the City updates the comments in the complaint file, the complainant is copied on the email. Feedback is provided by the status of the investigation: Submitted, Received, In-process, Duplicate, Could Not Verify, Not an Issue, Referred to [other Agency] Department, and Closed. Erosion and sediment control enforcement then follows the BMP D-4 ERP Process.
3. Measurable goal(s): Investigate 100% of complaints within three business days.

4. Documentation to be submitted with each Annual Report: A copy of the Reporting Year CitySourced database containing complaints received and their resolution (including date, type and status); and a copy of any enforcement actions taken will be provide in each Annual Report.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public works, community development

7. Rationale for choosing BMP and setting measurable goal(s): To provide service to citizen by properly investigating their environmental concerns.

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: Reduction of violations through consistent complaint response and education of both citizen and contractors.

SWMP Attachments:

- Complaint procedures, including receipt, investigation and enforcement
- Form used to document complaint receipt, handling, and resolution

F. BMP D-6 [4.2.4]: GSWCC Certifications

1. BMP Title: Certification
2. Description of BMP: The City will ensure that all MS4 staff involved in construction activities subject to the Construction General Permits either are or will be trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission (GSWCC).
3. Measurable goal(s): The City will ensure that all City personnel involved in construction or inspection are appropriately certified by GSWCC.
4. Documentation to be submitted with each Annual Report: Printouts of staff erosion control certifications from the GSWCC website will be provided.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works and Community Development.
7. Rationale for choosing BMP and setting measurable goal(s): Requiring certification of inspectors will ensure qualified personnel are performing inspections.
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: Increasing and maintaining qualified personnel.

**Post-Construction Storm Water Management in New Development and
Redevelopment**

Appendix E

Table 4.2.5 (a) of the Permit

A. BMP E-1 [4.2.5]: Legal Authority

1. BMP Title: Legal Authority
2. Description of BMP: Annually, compare the State General Permit requirements for Post-Construction Stormwater Management in New Development and Redevelopment against adopted City ordinance(s) to ensure the City's ordinance(s) sufficiently reflect current requirements and adopt changes to the permit requirements as necessary.
3. Measurable goal(s): Annually, evaluate, and, as necessary, update/revise the City's existing ordinance(s) to conform to changes in the requirements of the Post-Construction Stormwater Management in New Development and Redevelopment model ordinance adopted by the Metropolitan North Georgia Water Planning District (MNGWPD). This evaluation shall, at a minimum, evaluate any changes made to either the State rules/requirements or to the applicable City ordinances since the last annual review and determine what revisions are necessary. Revise applicable ordinance(s) within one-year from the rule change or change in requirements.

Interim Goal: Use the Center for Watershed Protection's Code and Ordinance Worksheet (COW) to evaluate the City's initial compliance with the Legal Authority requirements of the Permit.

4. Documentation to be submitted with each Annual Report: For each Annual Report, a statement certifying that the legal-authority review was conducted during the reporting year, a summary of what changes to (the) City ordinance(s) are required, if any, and the schedule status of any required ordinance revisions will be provided with each Annual Report. When revised, annotated copies of the revised ordinance(s) will be submitted with the Annual Report following adoption. The annotated copy shall indicate changes made to each ordinance by using "strikethrough" text for deletions and "underlined" text for text additions.

5. Schedule:
 - a. Interim milestone dates (if applicable): Complete
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually

- d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development
7. Rationale for choosing BMP and setting measurable goal(s): Enforcement of the design standards will result in the implementation of pollution control devices with greater stormwater runoff control.
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 effectiveness of this BMP will be measured through the successful adoption of a post construction ordinance that meets or exceeds the minimum standards of the GSMM manual.
-

SWMP Attachments:

- Post-Construction ordinance, showing adoption date.
- If the population exceeds 10,000, a completed worksheet or other method used to conduct the code and ordinance evaluation (e.g. Center for Watershed Protection's Code and Ordinance Worksheet, EPA's Scorecard).

B. BMP E-2 [4.2.5]: Update Inventory of Post-Construction Stormwater Management Facilities

1. BMP Title: Update Inventory of Publicly-Owned and Applicable Privately-Owned Post-Construction Stormwater Management Facilities (ponds/vaults)

2. Description of BMP: Update the inventory of all permittee-owned post-construction stormwater management structures (e.g., detention/retention ponds, water quality vaults, infiltration structures) and only those privately-owned (including other government entities) structures designed after December 5, 2014 (date of adoption of the GSMM) by geographic area each year.

3. Measurable goal(s): Annually update the inventory of post-construction structures by geographic area so that 100% of the structures are updated every five years.

4. Documentation to be submitted with each Annual Report: The updated inventory map, updated for one of be geographic area annually and a table / spreadsheet summarizing the current inventory of post-construction stormwater structures by number, type, and ownership: permittee-owned (City) and privately-owned (including other government entities) will be provided.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development, GIS.

7. 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.

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: Maintaining an up to date inventory will help keep structures operating properly through scheduled inspection and maintenance, reducing peak runoff and erosion.

SWMP Attachments:

- Inventory of detention/retention ponds and water quality vaults

C. BMP E-3 [4.2.5]: Post-construction Pond/Vault Inspection Program

1. BMP Title: Inspection Program
2. Description of BMP: The City will inspect the post-construction stormwater structures included in the BMP E-2 Inventory by geographic zone on an annually-rolling basis.
3. Measurable goal(s): Inspect a minimum of one geographically-based zone per year so that 100% of the inventoried post-construction stormwater structures are inspected within a 5-year permit period.
4. Documentation to be submitted with each Annual Report: Spreadsheets/tables summarizing the inspected condition of all structures inventoried in the BMP E-2 Inventory and inspected as part of BMP E-3 Inspection Program during the reporting period will be provided. The date of inspection will be included in the documentation. The inspection data may be included as part of the updated inventory or may be a stand-alone document.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development
7. Rationale for choosing BMP and setting measurable goal(s): Inspections will identify maintenance needs & ensure proper operation of structures.
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: Inspections that lead to maintenance will reduce the number of potential pollutant sources.

SWMP Attachments:

- Inspection procedures Example inspection forms
- Example table for tracking inspections conducted over permit cycle

D. BMP E-4 [4.2.5]: Post-Construction Stormwater Structure Maintenance Program

1. BMP Title: Maintenance Program
2. Description of BMP: Implement proper maintenance of permittee-owned BMP E-3 inventoried and inspected stormwater management structures, as outlined in the City's maintenance procedures. The City will operate and maintain the permittee-owned structures that were designed and constructed after the date of designation, according to the GSMM, to the Maximum Extent Practicable (MEP); track the structures maintained and the type of maintenance performed; obtain maintenance agreements outlining the owner's and the City's responsibilities on privately-owned structures (including other government entities) (constructed after the date of designation, October 3, 2013); track the number of maintenance agreements that the City has with owners of private structures; and issue maintenance-required letters to the owners of privately-owned structures (including other government entities).
3. Measurable goal(s): Provide required maintenance on 100% of permittee-owned ponds receiving an inspection score of High-Priority within one-year of inspection. Ensure maintenance agreements are obtained on 100% of new privately-owned (including other government entities) structures constructed and permitted after October 3, 2013 (date of designation) and issue maintenance-required letters to the owners of privately-owned structures (including other government entities).
4. Documentation to be submitted with each Annual Report: If the City conducts the maintenance, the documentation will be a list of completed work orders. If a private owner (including other government entities) is responsible for the maintenance under a maintenance agreement, the documentation will include: a summary list of these maintenance agreements; the total number of maintenance agreements, and a copy of letters issued to owners of privately
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works
7. Rationale for choosing BMP and setting measurable goal(s): Maintenance is a vital part in the long-term proper operation of stormwater operation of stormwater

structures and tracking maintenance activities helps in planning and preparing for future needs.

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 will identify and maintain all publicly-owned facilities, and Maintenance agreements will be collected from private owners.

SWMP Attachments:

- Example form for documenting maintenance
- Example maintenance agreements
- List of maintenance agreements executed to date
- Example letters to notify owners of maintenance deficiencies - Included in the Post-Construction Maintenance Program

E. BMP E-5 [4.2.5]: GI/LID Program

1. BMP Title: GI/LID Program
2. Description of BMP: The GI/LID program is under development and will include the following components: 1. Procedures for evaluating feasibility and site applicability of different GI/LID techniques and practices to be considered; 2. A list of GI/LID structures allowed to be constructed; and 3. Procedures for the inspection and maintenance of GI/LID structures for permittee-owned, publicly-owned (other public entities), and non-residential privately-owned structures. The program will establish who inspects, who maintains, inspection and maintenance schedule, and method of documentation of inspection and maintenance activities.

3. Measurable goal(s): The GI/LID program will be submitted by 2/15/20 and will be evaluated and updated, as necessary, annually._____
4. Documentation to be submitted with each Annual Report: A copy of the original program (2/15/20 Annual Report), copies of modifications made to the program during subsequent reporting years._____
5. Schedule:
 - a. Interim milestone dates (if applicable): 2/15/2020
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Community Development, Public Works, GIS._____
7. Rationale for choosing BMP and setting measurable goal(s): GI/LID ordinance and program will lead to better water quality._____
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 effectiveness of this BMP will be measured through the successful adoption of a GI/LID ordinance that meets or exceeds the minimum standards of the GSMM manual.

SWMP Attachments:

- GI/LID Program, including example inspection forms and maintenance agreements

F. BMP E-6 [4.2.5]: GI/LID Structures Inventory

1. BMP Title: GI/LID Structures Inventory
2. Description of BMP: Maintain an inventory of water quality related GI/LID structures (e.g/, bio swales, pervious pavement, rain gardens cisterns, and green roofs), by type and ownership, i.e. permittee-owned (City), publicly owned (other entities), and non-residential privately-owned systems, located within the City limits and constructed after October 3, 2013 (date of designation). The City will track the addition of new water-quality related GI/LID structures through the As-built drawing and Plat process and add these structures to the GI/LID inventory.

3. Measurable goal(s): Annually update the inventory of water quality related GI/LID structures by type and ownership and add to the inventory 100% of new water quality-related GI/LID structures through the AS-BUILT end-of-project process during the reporting year.

4. Documentation to be submitted with each Annual Report: The inventory of existing water quality-related GI/LID structures. Track the addition of new structures during the reporting year and include the updated inventory to the annual report for that reporting year.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development, GIS.

7. Rationale for choosing BMP and setting measurable goal(s): Tracking GI/LID structures will assist in evaluating the impact of these structures on water quality in each basin.

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: Tracking GI/LID structures will assist in evaluating the impact of these structures on water quality in each basin.

SWMP Attachments:

- Inventory of all permittee-owned GI/LID structures, and structures publicly-owned by other entities and privately-owned non-residential constructed after 12/6/12.

G. BMP E-7 [4.2.5]: GI/LID Structure Inspection Program

1. BMP Title: GI/LID Structure Inspection Program
2. Description of BMP: Beginning 2/15/2020, inspect the inventoried GI/LID structures in one of the five geographic zones, per the BMP E-6 schedule.

3. Measurable goal(s): Complete inspections on all of the inventoried GI/LID structures in one of the five geographic areas so that 100% of the GL/LID structures are inspected in a five-year period.
4. Documentation to be submitted with each Annual Report: Document annual inspections of GI/LID structures. For inspections of City-owned structures, the City will submit completed inspection forms.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Beginning 2020
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development, GIS.
7. Rationale for choosing BMP and setting measurable goal(s): Providing inspections of all structures helps identify maintenance needs for the proper operation of the MS4 system.
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 will identify all publicly-owned facilities, and Maintenance agreements will be collected from private owners.

SWMP Attachments:

- Example inspection forms
- Example table for tracking inspections conducted over permit cycle

H. BMP E-8 [4.2.5]: GI/LID Structure Maintenance Program

4. BMP Title: GI/LID Structure Maintenance Program
5. Description of BMP: Provide required maintenance on the permittee-owned GI/LID structures and implement the appropriate maintenance procedures of BMP E-5 for those publicly-owned (other public entities) and privately-owned non-residential GI/LID structures.
6. Measurable goal(s): Provide maintenance on each City-owned GI/LID structure requiring maintenance within one-year of inspection. Ensure that reasonable attempts to notify owners of publicly-owned (other public entities) and privately-owned non-residential GI/LID structures are made within 90 days of inspection.
4. Documentation to be submitted with each Annual Report: For maintenance on City-owned GI/LID structures, copies of the completed Work Orders, number of structures, and percentage of total structures maintained for the reporting year will be provided. For publicly-owned (other public entities) and privately-owned non-residential GI/LID structures a list of maintenance agreements held and compliance letters, which notify the Owner of maintenance needs, will be submitted.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Beginning 2020
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development, GIS.
7. Rationale for choosing BMP and setting measurable goal(s): Maintenance is a vital part in the long-term proper operation of stormwater operation of stormwater GI/LID structures and tracking maintenance activities helps in planning and preparing for future needs.
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 will identify and maintain all publicly-owned facilities, and Maintenance agreements will be collected from private owners.

SWMP Attachments:

- Example form for documenting maintenance

- Example maintenance agreements
- List of maintenance agreements executed to date. COB has not executed GI/LID maintenance agreements to-date.
- Example letters to notify owners of maintenance deficiencies – Included in the Post-Construction Maintenance Program

Pollution Prevention/Good Housekeeping for Municipal Operations – Best Management Practices

Appendix F

Table 4.2.6 (a) of the Permit

A. BMP F-1 [4.2.6]: MS4 Control Structure Inventory

1. BMP Title: MS4 Control Structure Inventory and Map
2. Description of BMP: The inventory of MS4 control structures includes all MS4-owned catch basins, ditches, detention/retention ponds and storm drain lines, within the City limits. The City has developed an inventory and map of the MS4 control structures; and will update the inventory and map as new structures are completed or existing structures are identified.
3. Measurable goal(s): Annually update the inventory and map of MS4 structures.
4. Documentation to be submitted with each Annual Report: A copy of the current or revised inventory and map of control structures; the number of structures, by type, added each year; and the revised total number of structures, by type.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, GIS.
7. Rationale for choosing BMP and setting measurable goal(s): The inventory will assist in identifying maintenance needs that would improve function and reduce erosion or pollutants.
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: Successful identification of all known Control Structures, and creation of a useful GIS map tool.

SWMP Attachments:

- Inventory listing 4 structure types (catch basins, ditches, pipes, permittee-owned ponds)
- Map showing 4 structure types

B. BMP F-2 [4.2.6]: MS4 Inspection Program

1. BMP Title: MS4 Inspection Program
2. Description of BMP: Conduct annual inspections of MS4 control structures concurrently with the BMP F-1 inventory. Maintain inspection and conditions assessment data in the City's GIS platform, per the Operations & Maintenance Program Document. Provide a condition assessment score to each control structure. Based on the scores, a maintenance prioritization score is listed in the GIS. High priorities are actionable. NOTE: The O&M Program document is being revised for the 2019 Annual Report. More specificity will be provided in the O&M Document.
3. Measurable goal(s): Complete inspections in all of the annually designated geographical area so that 100% of the MS4 is inspected during a five-year period.
4. Documentation to be submitted with each Annual Report: Provide a copy of the recorded GIS documentation in spreadsheet or table form which includes date of inspection, condition assessment, and maintenance prioritization. Summarize the number of MS4 control structures and the percentage of structures inspected during the reporting year in each annual report.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works
7. Rationale for choosing BMP and setting measurable goal(s): Providing inspections of all structures helps identify maintenance needs for the proper operation of the MS4 system.
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 results of the first inspection will be used to create a baseline. The effectiveness of this BMP will be

evaluated using the number of problems found during future inspections

SWMP Attachments:

- Inspection program, including implementation schedule
- Example inspection forms
- Example table for tracking inspections over the permit cycle

C. BMP F-3 [4.2.6]: MS4 Maintenance Program

1. BMP Title: MS4 Maintenance Program
2. Description of BMP: Provide maintenance to the City's MS4 control structures (catch basins, ditches, pipes, and City-owned ponds,) as determined by the results of the F-2 MS4 Inspection Program.
3. Measurable goal(s): Maintain 100% of structures listed as High Priority from the F-2 MS4 Inspection Program.
4. Documentation to be submitted with each Annual Report: List of completed work orders for the year.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Parks.
7. Rationale for choosing BMP and setting measurable goal(s): Maintenance is required for long term proper operation of MS4 structures.
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: Maintenance will improve operation of the MS4 structures and one-third of the area within the City limits will be identified.

SWMP Attachments:

- Maintenance procedures
- Example maintenance forms

D. BMP F-4 [4.2.6]: Street and Parking Lot Cleaning

1. BMP Title: Street and Parking Lot Cleaning
2. Description of BMP: Street sweeping activities will be conducted by Contractor(s) annually based on a planned rotation of streets, subject to adjustments based on street conditions. Street sweeping will not include clean-up of illegal dumping.
3. Measurable goal(s): Annually, at least 10 miles of City streets will be swept and the debris from those activities will be lawfully disposed.
4. Documentation to be submitted with each Annual Report: The City will submit a street sweeping log documenting street-miles cleaned and the tons of debris/litter removed as shown on invoices, weight tickets or similar documentation.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): Annually
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Parks
7. Rationale for choosing BMP and setting measurable goal(s): Reduce the amount of solid waste and pollutants in stormwater runoff from streets.
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: Documentation of all streets being swept in a five-year period with a quantifiable number associated with debris removal.

SWMP Attachments:

- Street sweeping procedures
- Street sweeping log page or other form
- Litter removal procedures
- Litter removal log page or other form

E. BMP F-5 [4.2.6]: Employee Training

1. BMP Title: Employee Training
2. Description of BMP: Conduct training sessions for Public Works and Parks and Recreation employees to address pollution prevention for municipal activities. A member of Public Works will coordinate the training. Training materials may include relevant videos, slides, posters, and pamphlets. Topics will include the following: good housekeeping at municipal facilities, illicit discharge detection, construction site inspections, and green infrastructure.
3. Measurable goal(s): Conduct one training session annually; and track the number of employees receiving training, the training dates and the subject of the training.
4. Documentation to be submitted with each Annual Report: The City will submit a copy of the training sign-in sheet, which would include the training date(s), and the subject of the training.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development, Community Relations, Web, Park, GIS, Volunteer.
7. Rationale for choosing BMP and setting measurable goal(s): Training helps employees be aware of the potential water quality impacts their job actions may cause, so that they can take steps to prevent them.
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: Over 80% attendance of currently applicable employees to the BMP training session each year.

SWMP Attachments:

- Employee training program
- Example sign-in sheet or other documentation forms

F. BMP F-6 [4.2.6]: Waste Disposal

1. BMP Title: Waste Disposal
2. Description of BMP: All waste and debris removed from the MS4 will be disposed of properly into an active landfill.
3. Measurable goal(s): 100% of the debris removed from the system will be properly disposed in a landfill.
4. Documentation to be submitted with each Annual Report: The City will submit a copy of the bill of lading or weight ticket from the landfill.
5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Continuously
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, Community Development
7. 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.
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: Being able to account for the dumping of all waste removed from the MS4.

SWMP Attachments:

- Waste disposal procedures
- Example form for tracking waste disposal

G. BMP F-7 [4.2.6]: New Flood Management Projects

1. BMP Title: New Flood Management Projects
2. Description of BMP: Ensure proposed flood management project designs (i.e. new development / re-development requiring detention / retention ponds) meet the requirements of the City's Stormwater Management Ordinance and the latest edition of the Georgia Stormwater Management Manual for water quality impacts through the Land Disturbance Permit process.

3. Measurable goal(s): Review 100% of proposed flood management projects submitted through the Land Disturbance Permit process.
4. Documentation to be submitted with each Annual Report: Report the number of plans reviewed annually where water quality impacts have been assessed.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): Ongoing
 - c. Frequency of actions (if applicable): Continuously
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: City Engineer, GIS.
7. Rationale for choosing BMP and setting measurable goal(s): Improve water quality of stormwater runoff from new development or redevelopment sites.

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 installation of water quality measures will have a reduction in TSS per the design standards.

SWMP Attachments:

- Procedures for assessing new plans for water quality impacts
- Example forms used to document the assessment of new plans

H. BMP F-8 [4.2.6]: Existing Flood Management Projects

1. BMP Title: Existing Flood Management Projects
2. Description of BMP: Each year, at least one existing permittee-owned flood management facility (detention and retention ponds) will be assessed to determine if the facility is a good candidate for retrofit with water quality BMPs.

3. Measurable goal(s): Perform the annual assessment and document the assessment results for at least one existing permittee-owned flood management project each year using the BMP F-8 Water Quality Improvement Feasibility Flow Chart.

4. Documentation to be submitted with each Annual Report: Provide a completed copy of the BMP F-8 Water Quality Improvement Feasibility Flow Chart.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): 2023 - 2027
 - c. Frequency of actions (if applicable): 20% Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, GIS.

7. Rationale for choosing BMP and setting measurable goal(s): Improve the water quality of stormwater runoff.

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: Any retrofit installed would be designed to improve water quality and reduce pollution.

SWMP Attachments:

- Procedures for assessing existing flood management structures for potential retrofit
- List of existing flood management structures
- Example forms used to document the assessment of existing structures

I. BMP F-9 [4.2.6]: Municipal Facilities

1. BMP Title: Municipal Facilities
2. Description of BMP: Update an inventory of facilities with the potential to cause pollution to the MS4 and inspect all inventoried facilities every 5 years.

3. Measurable goal(s): Annually update the inventory of municipal facilities. Inspect 100% of the municipal facilities within a 5-year period.
4. Documentation to be submitted with each Annual Report: The City will submit a copy of the inventory and inspection forms. Current inventory and inspection form is located in Appendix BMP F-9.

5. Schedule:
 - a. Interim milestone dates (if applicable): _____
 - b. Implementation date (if applicable): 2023 – 2027
 - c. Frequency of actions (if applicable): Annually
 - d. Month/Year of each action (if applicable): By December 31
6. Person (position) responsible for overall management and implementation of the BMP: Public Works, GIS, Parks.

7. Rationale for choosing BMP and setting measurable goal(s): Identifying facilities and practices aimed at reducing or eliminating the pollutant.

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: Identifying potential pollution sources through annual inspections.

SWMP Attachments:

- Inventory of municipal facilities
- Procedures for conducting inspections
- Example inspection forms
- Example table to track inspections over permit cycle

Enforcement Response Plan
Appendix G

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Stormwater Management Program during a previous permit iteration.
 - A. Provide the date the ERP was approved by EPD: December 2015
 - B. If the ERP has not yet been approved, provide the date submitted to EPD: 12/31/2015
2. The ERP is to be evaluated annually and revised as needed. Provide the most recent version of the ERP as an attachment to this Appendix.

NOTE: The ERP is included as an Appendix to the SWMP.

Impaired Waters
Appendix H

1. Population based on the latest U.S. Census: 55,366

Date of the latest U.S. Census used: July 1, 2022

If the population is less than 10,000, then see item #2 below.

If the population exceeds 10,000, then see items #3 below.
2. If the population is less than 10,000, then the MS4 must develop an Impaired Waters Plan (IWP) (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 within 4 years of designation.

Final completion date/date of submittal to EPD: December 20, 2019
4. If the population exceeds 10,000, then the MS4 must develop an Impaired Waters Plan/Monitoring and Implementation Plan (MIP) (see Part 4.4.2 of the NPDES Permit) including:
 - A list of impaired waters and the pollutant(s) of concern, including the date of the 303(d) list used;
 - A map showing the location of the impaired waters, the monitoring location(s), and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters;
 - The sample location (instream or at the outfalls);
 - Information on the sample type, frequency, and any seasonal considerations;
 - Schedule for starting monitoring for any newly identified pollutants;
 - BMPs that will be implemented to address each pollutant of concern;
 - A schedule for implementing the BMPs; and
 - The information to be included in each annual report, including the monitoring data, as assessment of data trends, and an assessment of the effectiveness of the BMPs.
5. The Impaired Waters Plan/Monitoring and Implementation Plan must be submitted with the annual report due 4 years of designation.

Completion date/date of submittal to EPD: The revised IWP was completed on December 20, 2019 and submitted in January 2020.

6. The IWP and MIP must be evaluated annually and revised as needed. The most recent version of the IWP or MIP must be submitted as an attachment to this appendix.

NOTE: Upon update to the 2022 303(d) list, the Impaired Waters Plan will be included as an Appendix to the SWMP.