

February 11, 2021

Lisa Perrett
Environmental Specialist, Stormwater Unit
Watershed Protection Branch
Environmental Protection Division
Georgia Department of Environmental Protection
2 Martin Luther King, Jr Drive
Suite 1152, East Tower
Atlanta, GA 30334

SUBJECT:

2020 MS4 Annual Report

Phase II MS4, Proposed Stormwater Management Program

NPDES Permit No. GAG61000

City of Brookhaven, GA

Dear Ms. Perrett:

Please find attached the City of Brookhaven's 2020 Annual Report for the City's Stormwater Management Program (SWMP). A three-hole punched hard copy of the completed and signed Annual Report Form is included in the envelope. On an USB Flash Drive, you will find copies of this document, the Post-Construction Stormwater Management in New Development and Redevelopment, revised in 2020, as well as the supporting data for each of the SWMP best management practice (BMPs) activities completed in 2020. The Table of Contents for the Annual Report has hyperlinks to each of the BMP summaries to aid in your review.

If you have any questions, please contact me at tom.roberts@brookhavenga.gov or 404.637.0247.

Very truly yours,
City of Brookhaven

Tom Roberts, PE

Stormwater Manager

Department of Public Works

Attached Documents: 2020 Annual Report and a USB Flash Drive

cc: Hari Karikaran, P.E., Director of Public Works

### Phase II Municipal Separate Storm Sewer System (MS4) <u>Annual Report Form</u>

#### Cover Page

Part 1.	General	<b>Information:</b>

1. Permittee Name:

City of Brookhaven, GA

2. Mailing Address:

4362 Peachtree Rd, Brookhaven, GA 30319

3. Contact Person:

William T. Roberts, III, P.E.

4. E-Mail Address:

tom.roberts@brookhavenga.gov

5. Telephone Number:

(404) 637-0528

6. Reporting Year (January 1-December 31): 2020

### Part 2. Status of Storm Water Management Program:

- 1. Has your storm water management program to comply with the 2017 NPDES Permit been approved? Yes⊠ No □
- 2. If yes, provide the approval date: March 30, 2020
- 3. If no, provide the date of the last submittal: Click here to enter text.

### Part 3. 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 gather and evaluate the information submitted. Based on 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.

Signature:	
Printed Name: Hari Karikaran, P.E.	2 I
Title: Public Works Director Date:	02 08 2021

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## Public Education and Outreach Minimum Control Measure (Table 4.2.1)

1.	BMP # A-1
2.	BMP Title: Brochures in Public Places
3.	<b>Provide the measurable goal from SWMP:</b> 50 copies of each educational pamphlet type are stocked at three locations: City Hall, City Hall Council Chambers, and Lynwood Park Recreation Center. Pamphlets will be made available at volunteer events throughout the year. The pamphlets are available online at this link: <a href="https://www.brookhavenga.gov/publicworks/page/stormwater-public-service-announcements">https://www.brookhavenga.gov/publicworks/page/stormwater-public-service-announcements</a>
	A. Did you comply with the measurable goal? Yes⊠ No □
	B. If not, explain why you did not comply with the measurable goal:
4.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: Pamphlets were made available to the public at Town Hall meetings, public libraries, and at volunteer events like the City Stream cleaning and Marker program. Additionally, email responses to citizer with general stormwater questions had pdf attachments of the pamphlets.
	B. Date(s) for any BMP activities completed during this reporting period: Pamphlets distributed January 1 – December 31
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes ⊠No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP?

Continue⊠ Revise□

<ul> <li>C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠</li> </ul>
D. If yes, please explain:

2.	BMP Title: City Stormwater Website
3.	<b>Provide the measurable goal from SWMP:</b> Publish two articles per year onto the website and track Stormwater website visits.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: At least two new articles were posted to the City's Stormwater website. Stormwater website visits were counted.
	B. Date(s) for any BMP activities completed during this reporting period: December 2020.
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
	C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
	D. If yes, please explain:

1.

BMP #A-2

- 1. **BMP** # **A-3**
- 2. **BMP Title:** Present Stormwater Topics to School-Age Children
- 3. **Provide the measurable goal from SWMP:** Hold one in-school stormwater presentation and discussion event annually.
  - A. Did you comply with the measurable goal? Yes⊠\* No□ \*COVID-19 restrictions prevented in-school presentations as school became virtual in March 2020. An alternate approach to reach school-age children.
  - B. If not, explain why you did not comply with the measurable goal:

#### 4. **Documentation**

- A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
- B. If not, please explain why:

### 5. **Implementation Schedule**

- A. BMP activities completed during this reporting period: On December 19, 2020 an event was held combining BMP A-3 and BMP B-1 Storm Drain Marker Program. The event was held at outside at Murphey Candler Park. The Stormwater Manager delivered an interactive stormwater management educational presentation to attendees and formally repeated the presentation multiple times using the Enviroscape Watershed Model. In addition, the Stormwater Manager provided informal presentations summarizing the City's entire Stormwater Management Program to multiple, five, family groups after the formal presentations had concluded. Three schools (Montgomery Elementary, Atlanta International School, and Chamblee High School) and at least three different age groups (elementary age, high school age, and adults) received the formal interactive presentation using the Enviroscape model. Students were asked to add "soil (red candy sprinkles)," "manure (chocolate sprinkles)," "trash (clear candy sprinkles)," etc., and made it "rain" over the watershed. Questions and answers were spread throughout the free-form agenda, which allowed the children to drill down (with guidance) on issues of interest to them.
- B. Date(s) for any BMP activities completed during this reporting period: 12/19/20
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:
- 6. **BMP Effectiveness**

В.	Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
C	Do you plan to revise the PMP description, implementation schedule, or measurable

A. Do you consider this BMP to be effective? Yes  $\boxtimes$  No $\square$ 

C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠

D. If yes, please explain:

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- 2. **BMP Title:** Social Media
- 3. **Provide the measurable goal from SWMP:** 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.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal:

#### 4. **Documentation**

- A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
- B. If not, please explain why:

#### 5. **Implementation Schedule**

- A. BMP activities completed during this reporting period: Social media blasts from the City's Communications Department were scheduled throughout the year and were scheduled for the appropriate time of the year.
- B. Date(s) for any BMP activities completed during this reporting period: Multiple times throughout the year.
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes  $\square$  No $\boxtimes$
- D. If yes, please explain:

# Public Involvement/ Participation Minimum Control Measure (Table 4.2.2)

1.	BMP # B-1
2.	BMP Title: Storm Drain Marker Program
3.	<b>Provide the measurable goal from SWMP:</b> Hold one storm drain marking even annually.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: A storm drain marking program event was held in December 2020, where participants were trained on how to instal the placards and in-depth discussions detailed the City's Stormwater Managemen Program, with a more specific focus on Illicit Discharge Detection and Elimination and approaches the City was taking to divert potential illegal discharges into the stormwater through the Storm Drain Marking Program, Recycling Events, Pet Waste Stations, and other programs. The Enviroscape Watershed model was also used to demonstrate how anything left on the ground had the potential to enter the MS4.
	B. Date(s) for any BMP activities completed during this reporting period: 12/19/20
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP Continue Revise□

C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
D. If yes, please explain:

1.	BMP # B-2
2.	BMP Title: Streamside Clean-up Program
3.	<b>Provide the measurable goal from SWMP:</b> 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.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: On 8/29/20, Public Works partnered with the Murphy Candler Park Conservancy and the Chattahoochee Riverkeeper for the 2020 "Sweep the 'Hooche" regional stream cleanup event. Three main focal areas were cleaned, N Fork Nancy Creek above Murphey Candler Lake, Murphey Candler Lake, and N Fork Nancy Creek below Murphey Candler Lake. Over 135 participating volunteers collected over 95 garbage bags of trash, 16 bags of recyclable materials, 10 tires, and a concrete mixing machine were collected.
	B. Date(s) for any BMP activities completed during this reporting period: August 29, 2020
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it from the SWMP? Continue⊠ Revise□
	C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
	D. If yes, please explain:

- 2. **BMP Title:** Pet Waste Stations
- 3. **Provide the measurable goal from SWMP:** 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.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal:

#### 4. **Documentation**

- A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
- B. If not, please explain why:

#### 5. **Implementation Schedule**

- A. BMP activities completed during this reporting period: Over 286,000 pet waste bags were used in the City's nine parks. Residents at Brookhaven Park, at the intersection of Peachtree Rd and Osborne Rd, used nearly twice the number of bags than any other location, 86,200.
- B. Date(s) for any BMP activities completed during this reporting period: Continuous
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes  $\square$  No $\boxtimes$
- D. If yes, please explain:

- 1. **BMP** # **B-4**
- 2. **BMP Title:** Recycling Facility or Event
- 3. **Provide the measurable goal from SWMP:** 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.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal:

#### 4. **Documentation**

- A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
- B. If not, please explain why:

#### 5. **Implementation Schedule**

- A. BMP activities completed during this reporting period: Two recycling events were held this year at the Lowe's in Chamblee, where the Cities of Chamblee and Brookhaven Partnered with the DeKalb County Sanitation Division's to collect recyclable and difficult to dispose materials. Over 730 donors participated, representing 39 local zip codes, of which over 300 donors were Brookhaven residents.
- B. Date(s) for any BMP activities completed during this reporting period: January 4 and February 1, 2020.
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it from the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes  $\square$  No $\boxtimes$
- D. If yes, please explain:

# Illicit Discharge Detection and Elimination Minimum Control Measure (Table 4.2.3)

1.	BMP # C-1
2.	BMP Title: Legal Authority
3.	Provide the measurable goal from the Permit and/or approved SWMP: Review annually and revise if necessary.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Ordinance Status
	A. Did you adopt or revise the ordinance during the reporting period? Yes□ No⊠
	B. If yes, provide the date of adoption:
	C. If the ordinance was adopted or revised during the reporting period, is a copy of the adopted ordinance attached? Yes□ No□
	D. If the ordinance was adopted or revised during the reporting period and a copy is no attached, explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: There were no IDDE Mode Ordinance updates during the year, and there were no material changes made to the City's existing and compliant ordinance. Review of the ordinance was completed during preparation of the 2018 SWMP.
	B. Date(s) for any BMP activities completed during this reporting period: July and October 2019
	C. Did you comply with the implementation schedule in the SWMP? Yes $\boxtimes$ No $\square$
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□

- B. Do you plan to continue with implementation of this BMP or revise it from the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes  $\square$  No $\boxtimes$
- D. If yes, please explain:

- 1. **BMP # C-2** 2. **BMP Title:** Outfall Map and Inventory 3. Provide the measurable goal from the Permit and/or approved SWMP: 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. A. Did you comply with the measurable goal? Yes⊠ No□ B. If not, explain why you did not comply with the measurable goal: 4. **Outfall Inventory** A. Provide the number of outfalls added or deleted from the inventory during the reporting period: Number added:1 Number deleted: 0 B. Provide the total number of outfalls identified to date: 457 C. Is the outfall mapping completed? Yes⊠ No□ D. If not, explain the reason why, and provide the status of the mapping: E. If not, provide the projected completion date: 5. **Documentation** A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□ B. If not, please explain why:
- 6. **Implementation Schedule** 
  - A. BMP activities completed during this reporting period: The City's MS4 Inspection and Assessment contractor, GMC, completed the assessments of the outfalls in Area 2, the south side of the City, in 2020 and in newly annexed areas of LaVista Park. One new outfall was added during the year.
  - B. Date(s) for any BMP activities completed during this reporting period: Throughout the year.
  - C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□

D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes  $\square$  No $\boxtimes$
- D. If yes, please explain:

#### 1. **BMP** # **C-3**

2. **BMP Title:** IDDE Plan

#### 3. Provide the measurable goal from the Permit and/or approved SWMP:

- 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.
- A. Did you comply with the measurable goal? Yes⊠ No□
- B. If not, explain why you did not comply with the measurable goal:

#### 4. **IDDE Plan Status**

- A. Provide the number of outfalls inspected during the reporting period: 105
- B. What percentage of the total number of outfalls were inspected during the reporting period? 23.0%%
- C. Provide the status of the outfall screening from 2018-2022:

Year	<b>Total Number of</b>	Number of	% Screened
	Outfalls	<b>Outfalls Screened</b>	
2018	456	$0^{1}$	0%
2019	456	81	17.8%%
2020	457	105	23.0%
2021			
2022			

D. Did you conduct any stream walks as part of your IDDE program? Yes□ No⊠

<sup>&</sup>lt;sup>1</sup> In 2017, the City completed DWS in 2 geographical areas (~40% of the City). Thus, the DWS screening scheduled for 2018 was completed a year early.

	1.	If yes, provide the total number of stream miles within your jurisdiction:
	2.	Provide the number of stream miles walked during the reporting period:
	3.	What percentage of the total number of stream miles were walked during the reporting period?
E.	Die	d you conduct stream walks for a reason other than IDDE? Yes□ No⊠
	1.	If yes, explain the reason:
	2.	Provide the number of stream miles walked during the reporting period: N/A
Do	cun	nentation
A.		d you attach documentation of the BMP activities completed during the reporting riod? Yes⊠ No□
B.	If r	not, please explain why:
Im	ple	mentation Schedule

#### 6. In

5.

- A. BMP activities completed during this reporting period: The City's MS4 dry weather screening contractor, GMC, completed dry weather screening on the outfalls in Area 2, the south side of the City, in 2020 and in newly annexed areas of LaVista Park.
- B. Date(s) for any BMP activities completed during this reporting period: Throughout the year.
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
- D. If yes, please explain:

1. **BMP # C-4** 2. **BMP Title:** IDDE Education 3. Provide the measurable goal from the Permit and/or approved SWMP: Fifty (50) 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. A. Did you comply with the measurable goal? Yes⊠ No□ B. If not, explain why you did not comply with the measurable goal: 4. **Documentation** A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□ B. If not, please explain why: 5. **Implementation Schedule** A. BMP activities completed during this reporting period: Pamphlets were made available to the public at Town Hall meetings, public libraries, and at volunteer events like the City Stream cleaning and Marker program. B. Date(s) for any BMP activities completed during this reporting period: As needed. C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□ D. If not, please explain why: **BMP Effectiveness** 6. A. Do you consider this BMP to be effective? Yes⊠ No□ B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□ C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠ D. If yes, please explain:

1. BMP # C-5 2. **BMP Title:** Complaint Response 3. Provide the measurable goal from the Permit and/or approved SWMP: 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. A. Did you comply with the measurable goal? Yes⊠ No□ B. If not, explain why you did not comply with the measurable goal: 4. **Documentation** A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□ B. If not, please explain why: 5. **Implementation Schedule** A. BMP activities completed during this reporting period: The City received four complaints possibly related to illicit connections and/or illegal discharges through the Brookhaven Connect web services application. All were first investigated by City of Brookhaven Stormwater staff trained in illicit discharge source tracking. Of these, two likely had a discharge that could be confirmed. One of these was groundwater flow, and the other was a likely sanitary sewer spill. No evidence of an illicit discharge into the MS4 could be confirmed on the other two. The likely sanitary sewer spill into a creek was reported to and handed by DeKalb County Department of Watershed Management. B. Date(s) for any BMP activities completed during this reporting period: Various C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□ D. If not, please explain why: 6. **BMP Effectiveness** A. Do you consider this BMP to be effective? Yes⊠ No□

B. Do you plan to continue with implementation of this BMP or revise it in the SWMP?

Continue⊠ Revise□

<ul> <li>C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠</li> </ul>
D. If yes, please explain:

### Construction Site Storm Water Runoff Control Minimum Control Measure (Table 4.2.4)

1.	BMP # D-1
2.	BMP Title: Legal Authority
3.	<b>Provide the measurable goal from the Permit and/or approved SWMP:</b> The City will review ordinance annually and revise as necessary.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Ordinance Status
	A. Is the construction waste requirement addressed in either your E&S or litter ordinance? Yes⊠ No□ The required language of <i>construction waste requirement</i> was added to the Litter Control Ordinance and adopted by the City Council on October 13, 2020.
	B. If yes, which one? Chapter 22, Article V – Litter Control
	<ul><li>C. Did you adopt or revise the ordinance during the reporting period?</li><li>Yes⊠ No□ (Copy attached)</li></ul>
	D. If you are a Local Issuing Authority, you must revise your E&S Ordinance to comply with the latest revisions to the E&S Act (2015). Have you completed the ordinance revisions?  Yes⊠ No□
	E. If yes, provide the date of adoption: Multiple revisions: 8/22/17, 3/27/18, 2/26/19, 5/28/19. Copies of the E&S provided with the 2019 Annual Report,
	F. If the ordinance was adopted or revised during the reporting period, is a copy of the adopted ordinance attached? Yes□ No⊠
	G. If the ordinance was adopted or revised during the reporting period and a copy is not attached, explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: Revisions to Section 22-1 and

were approved by City Council on October 13, 2020.

Article V – Litter Control that contain the EPA required Construction Waste language

- B. Date(s) for any BMP activities completed during this reporting period: October 13, 2020
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
- D. If yes, please explain:

1.	BMP # D-2
2.	BMP Title: Site Plan Review Procedures
3.	Provide the measurable goal from the Permit and/or approved SWMP: 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.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Site Plan Review Status
	A. Are you a Local Issuing Authority? Yes⊠ No□
	1. If yes, provide the following information for the reporting period:
	Number of plans received: 18 Number of plans reviewed: 18, 6 remained under review at the end of 2020 Number of plans approved: 9 Number of plans denied: 3 denied
5.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
6.	Implementation Schedule
	A. BMP activities completed during this reporting period: Existing program.
	B. Date(s) for any BMP activities completed during this reporting period: Continuous
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
7.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□

C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
D. If yes, please explain:

1.	BMP # D-3
2.	BMP Title: Construction Site Inspection Program
3.	Provide the measurable goal from the Permit and/or approved SWMP: Conduct inspections on 100% of the active construction sites at the beginning of construction, during active construction, and at final stabilization.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? ⊠Yes □No
	B. If not, please explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: Existing program.
	B. Date(s) for any BMP activities completed during this reporting period: Continuous
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
	C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
	D. If yes, please explain:

2.	BMP Title: Enforcement Procedures
3.	<b>Provide the measurable goal from the Permit and/or approved SWMP:</b> Ensure enforcement is taken on 100% of violations noted during site inspections.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: <b>Existing program</b> 105 NOV's and 29 Stop Work Orders were issued.
	B. Date(s) for any BMP activities completed during this reporting period: <b>Ongoing</b>
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
	C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
	D. If yes, please explain:

1.

BMP # D-4

1.	BMP # D-5
2.	BMP Title: Erosion & Sediment Control Complaint Response
3.	<b>Provide the measurable goal from the Permit and/or approved SWMP:</b> ): Investigate 100% of complaints within three business days.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: <b>Existing program.</b> The City's public facing Brookhaven Connect web application receives complaints from the public related to Erosion & Sediment Control issues at construction sites in the City. In 2020, Brookhaven Connect, also known as CitySourced, received 53 public reported E&SC complaints. Each was investigated and either closed or escalated and then closed.
	B. Date(s) for any BMP activities completed during this reporting period: <b>Ongoing</b>
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
	C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠

D. If yes, please explain:

2.	BMP Title: GSWCC Certification
3.	<b>Provide the measurable goal from the Permit and/or approved SWMP:</b> The City will ensure that all City personnel involved in construction or inspection are appropriately certified by GSWCC.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: <b>Existing program</b>
	B. Date(s) for any BMP activities completed during this reporting period: <b>Ongoing</b>
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
	C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
	D. If yes, please explain:

1.

**BMP # D-6** 

# Post- Construction Storm Water Management in New Development and Redevelopment Minimum Control Measure (Table 4.2.5)

1	BMP # E-1
	KWIP#H-I

2.	BMP'	Title:	Legal	Authority	y
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- 3. **Provide the measurable goal from the Permit and/or approved SWMP:** Annually, evaluate, and, as necessary, update/revise the City's existing ordinance(s) to comply with 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.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal:

#### 4. **Ordinance Status**

- A. Did you adopt or revise the ordinance during the reporting period? Yes□ No⊠
- B. If yes, provide the date of adoption: October 13, 2020.
- C. Does the ordinance require development in accordance with the Georgia Stormwater Management Manual (GSMM), a local design manual, and/or the Coastal Stormwater Supplement? Yes⊠ No□
- D. Does the ordinance adopt the performance standards in the 2016 GSMM? Yes⊠ No□
- E. The adoption of the performance standards in the 2016 GSMM was required by January 2, 2017. If the adoption has not occurred by this deadline date, explain why and provide the projected completion date:
- F. If the ordinance was adopted or revised during the reporting period, is a copy of the adopted ordinance attached? Yes⊠ No□
- G. If the ordinance was adopted or revised during the reporting period and a copy is not attached, explain why:

# 5. **Implementation Schedule**

- A. BMP activities completed during this reporting period: State regulations and/or permit requirements did not change during the reporting year. There were changes made to the MNGWP Post-Construction Model Ordinance. The updated MNGWP Post-Construction Model Ordinance was adopted by City Council in 2020. The Center for Watershed Protection's Code and Ordinance Worksheet (COW) was completed during the review and comment period for the 2018-2022 SWMP in 2019. City ordinances were reviewed and found to be compliant. No changes, other than those reported in this Annual Report were required or made.
- B. Date(s) for any BMP activities completed during this reporting period: October 13, 2020.
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes⊠ No□
- D. If yes, please explain:

- 1. **BMP** # **E-2**
- 2. **BMP Title:** Update Inventory of Post-construction Stormwater Management Facilities
- 3. **Provide the measurable goal from the Permit and/or approved SWMP:** Annually update the inventory of post-construction structures by geographic area so that 100% of the structures are updated every five years.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal:

# 4. **Inventory Status**

- A. Provide information on the number of structures inventoried during the reporting period:
  - 1. Number of publicly-owned post-construction structures added: 0
  - 2. Number of privately-owned post-construction structures added: 88
- B. Provide information on the number of structures identified to date:
  - Total number of publicly-owned post-construction structures: 6 publicly-owned structures.
  - 2. Total number of privately-owned post-construction structures: There are 22 privately-owned structures constructed after the date of designation, which have Stormwater Facility Maintenance Agreements (SWFMA).

# 5. **Documentation**

- A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
- B. If not, please explain why:

# 6. **Implementation Schedule**

- A. BMP activities completed during this reporting period: **Existing program.** The City's MS4 Inventory, Mapping, and Assessment Contractor, GMC, verified and updated the inventory and mapping of 100% of the post-construction stormwater management structures in geographic Area 2 and in newly annexed areas of LaVista Park in 2020.
- B. Date(s) for any BMP activities completed during this reporting period: Continuous
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□

7. BMP Effectiveness
A. Do you consider this BMP to be effective? Yes⊠ No□
B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠

D. If not, please explain why:

D. If yes, please explain:

- 1. **BMP # E-3**
- 2. **BMP Title:** Post-construction Pond/Vault Inspection Program
- 3. **Provide the measurable goal from the Permit and/or approved SWMP:** 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.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal: <u>Click here to enter</u> text.
- 4. Provide the status of inspections performed between 2018-2022:

**Publicly-Owned Post-Construction Structures** 

	Year	Total Number Post Construction Structures	Number Post Construction Structures Inspected	% Inspected
Γ	2018	6	$0^{2}$	
	2019	6	4	67%
	2020	6	1	17%
	2021			
	2022			

**Privately-Owned Post-Construction Structures** 

Year	Total Number Post Construction Structures	Number Post Construction Structures Inspected	% Inspected
2018		$0^{2}$	
2019	22	N/A*	N/A*
2020	22	N/A*	N/A*
2021			
2022			

<sup>\*</sup>Per the 2019 Annual Report, the total number of Privately-Owned Post-Construction Stormwater Structures that meets the criteria for inclusion in the City's MS4 Program was re-established. All have SWFMAs and were built in the last five (5) years, therefore, inspections and/or inspection letters have not yet been required.

#### 5. Documentation

A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□

<sup>&</sup>lt;sup>2</sup> In 2017, the City completed post-construction stormwater management structure inspections in 2 geographical areas (~40% of the City). Thus, the inspections scheduled for 2018 was completed a year early.

B. If not, please explain why:

## 6. **Implementation Schedule**

- A. BMP activities completed during this reporting period: 100% of City-owned structures in Zone 2 were inspected in 2020. The privately-owned structures built after the Date of Designation that are located in Zone 2 were each constructed in the last five (5) years, thus they were not due for inspection or collection of inspection reports from the Owners.
- B. Date(s) for any BMP activities completed during this reporting period: Continuous
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
- D. If yes, please explain:

- 1. **BMP** # **E-4**
- 2. BMP Title: Post-Construction Stormwater Structure Maintenance Program
- 3. **Provide the measurable goal from the Permit and/or approved SWMP:** 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) for which the City has a recorded maintenance agreement.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal:

#### 4. **Documentation**

- A. Did you attach documentation of the BMP activities completed during the reporting period?:
  - 1. Maintenance of permittee-owned structures: Yes⊠ No□
  - 2. Maintenance conducted by permittee on privately-owned structures or publicly-owned by other entities: Yes  $\boxtimes$ No  $\square$  NA  $\square$
  - 3. Summary list of maintenance agreements: Yes ⊠ No □
- B. If not, please explain why:

## 5. **Implementation Schedule**

- A. BMP activities completed during this reporting period: **Existing program.**Maintenance on three post-construction control structures was completed in 2020.
- B. Date(s) for any BMP activities completed during this reporting period: **Varies.** See Table.
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□

C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
D. If yes, please explain:

1. **BMP # E-5** 2. **BMP Title:** GI/LID Structure Inventory Provide the measurable goal from the Permit and/or approved SWMP: Annually 3. 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. A. Did you comply with the measurable goal? Yes⊠ No□ B. If not, explain why you did not comply with the measurable goal: 4. **Documentation** A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□ B. If not, please explain why: 5. **Implementation Schedule** A. BMP activities completed during this reporting period: **Existing program.** No new GI/LID structures were added to the inventory in 2019. B. Date(s) for any BMP activities completed during this reporting period: N/A C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□ D. If not, please explain why: 6. **BMP Effectiveness** A. Do you consider this BMP to be effective? Yes⊠ No□ B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□ C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠ D. If yes, please explain:

1.	BMP # E-6
2.	BMP Title: GI/LID Program
3.	<b>Provide the measurable goal from the Permit and/or approved SWMP:</b> The GI/LID program was approved by EPD in 2020.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Program Development
	A. Has the GI/LID Program development been completed? Yes ⊠No □
	Note: For existing permittees, the deadline is February 15, 2020. For new permittees the deadline is within 3 years of designation.
5.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
6.	Implementation Schedule
	A. BMP activities completed during this reporting period: Completed development and approval of the Program
	B. Date(s) for any BMP activities completed during this reporting period: EPD accepted GI/LID Program on October 5, 2020.
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
7.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP Continue Revise□

C.	Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes $\square$ No $\boxtimes$
D.	If yes, please explain:

- 1. **BMP** # **E-7**
- 2. **BMP Title:** GI/LID Inspection and Maintenance Program
- 3. **Provide the measurable goal from the Permit and/or approved SWMP:** 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. 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.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal:

#### 4. **Documentation**

- A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
- B. If not, please explain why:

# 5. **Implementation Schedule**

- A. BMP activities completed during this reporting period: Implementation of the GI/LID Program.
- B. Date(s) for any BMP activities completed during this reporting period: EPD Acceptance of program, October 5, 2020.
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
- D. If yes, please explain:

# <u>GI/LID Ordinance Review (Section 4.2.5.3)</u> (Only complete this section if the MS4 population >10,000 on December 6, 2017)

1.	You are required to continue to review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI/LID practices. Was an evaluation of the MS4's ordinances, codes, and regulations conducted during the reporting period? Yes⊠ No□
2.	If an evaluation was completed during the reporting period, is documentation of the activity attached to this annual report? Yes $\boxtimes$ No $\square$ NA $\square$
3.	Based on the results of the evaluation, did the MS4 determine that revisions to the ordinances, codes, and regulations were necessary? Yes $\square$ No $\boxtimes$ NA $\square$
4.	If revisions to the document(s) were required, provide the name of the document(s) and the date(s) of adoption: $N/A$
5.	If revisions have not yet been completed, provide the status of the document revisions and a projected completion date: N/A

# Pollution Prevention/ Good Housekeeping for Municipal Operations Minimum Control Measure (Table 4.2.6)

- 1. **BMP # F-1**
- 2. **BMP Title:** MS4 Control Structure Inventory and Map
- 3. **Provide the measurable goal from the Permit and/or approved SWMP:** Annually update the inventory and map of MS4 structures.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal:

## 4. Inventory and Map Status

- A. Provide the number of structures inventoried and mapped during the reporting period:
  - 1. Number of catch basins added: 16 added. 432 MS4 catch basins were inventoried in 2020.
  - 2. Number of ditches added (state if miles or linear feet): 1,645 subtracted. 4,849 lf of MS4 ditches were inventoried in 2020.
  - 3. Number of publicly-owned detention/retention ponds added: 33 were deleted 1 MS4 pond were inventoried in 2020.
  - 4. Number of storm drain lines added (state if miles or linear feet): 1,066 lf subtracted. 41,287 lf of MS4 storm drain lines were inventoried in 2020.
- B. Provide the number of structures inventoried and mapped to date:
  - 1. Total number of catch basins: 878
  - 2. Total number of ditches (state if miles or linear feet): 8,922 lf
  - 3. Total number of publicly-owned detention/retention ponds: 6 publicly owned.
  - 4. Total number of storm drain lines (state if miles or linear feet): 59,069 lf

#### 5. **Documentation**

- A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
- B. If not, please explain why:

## 6. **Implementation Schedule**

A. BMP activities completed during this reporting period: **Existing program.** The City's MS4 Inventory, Mapping, and Assessment contractor, GMC, completed inventory,

	LaVista Park in 2020.
B.	Date(s) for any BMP activities completed during this reporting period: Continuous
C.	Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
D.	If not, please explain why:
BN	IP Effectiveness
A.	Do you consider this BMP to be effective? Yes⊠ No□
B.	Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
C.	Do you plan to revise the BMP description, implementation schedule, or measurable

mapping, and assessment in the geographic zone, Area 2, and newly annexed areas in

D. If yes, please explain:

7.

- 1. **BMP** # **F-2**
- 2. **BMP Title:** MS4 Inspection Program
- 3. **Provide the measurable goal from the Permit and/or approved SWMP:** Complete inspections in all of the annually designated geographical area so that 100% of the MS4 is inspected during a five-year period.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal:
- 4. Provide the status of inspections performed between 2018-2022:

#### **Catch Basins**

	Year	Total Number Catch Basins	Number Catch Basins Inspected	% Inspected
	2018		281 total structures <sup>3</sup>	
I	2019	1,918	165	8.6%
I	2020	1,934	432	22.3%
	2021			
	2022			

**Pipes** 

Year	Total Pipes Number or Length (specify ft. or miles)	Number of Pipes or Length Inspected (specify ft. or miles)	% Inspected
2018		33 total conveyances <sup>3</sup>	
2019	199,264 lf	17,782 lf	8.9%
2020	198,198 lf	41,287 lf	20.8%
2021			
2022			

<sup>&</sup>lt;sup>3</sup> In 2017, the City completed MS4 structure inspections in 2 geographical areas (~40% of the City). Thus, the inspections scheduled for 2018 was completed a year early. City staff performed follow-up inspections on previously reported MS4 structures in 2018 to determine the Scope of Work for Work Orders, if necessary. Once existing and 2018 Work Orders were completed, City staff performed inspections on the completed work.

#### **Ditches**

Year	Total Ditches Number or Length (specify ft. or miles)	Number of Ditches or Length Inspected (specify ft. or miles)	% Inspected
2018		See Appendix for BMP F-2 and BMP F-3 <sup>3</sup>	
2019	52,164 lf	4,073 lf	7.8%
2020	50,519 lf	4,849 lf	9.6%
2021			`
2022			

**Publicly-Owned Detention/Retention Ponds** 

Year	Total Number Structures	Number Structures Inspected	% Inspected
2018		See Appendix for BMP F-2 and BMP F-3 <sup>3</sup>	
2019	39	7	17.9%
2020	6	1	16.7%
2021			
2022			

#### 5. **Documentation**

A.	Did you attach	documentation	of the	BMP	activities	completed	during	the	reportin	g
	period? Yes⊠	No□								

$\mathbf{p}$	If not	nlasca	explain	why
D.	H HOU.	blease	expiam	WIIV.

## 6. **Implementation Schedule**

- A. BMP activities completed during this reporting period: **Existing program.** The City's MS4 Inventory, Mapping, and Assessment Contractor, GMC, assessed 100% of the MS4 structures in geographic zone, Area 2, and newly annexed areas of LaVista Park in 2020.
- B. Date(s) for any BMP activities completed during this reporting period: Continuous
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

# 7. **BMP Effectiveness**

A. Do you consider this BMP to be effective? Yes⊠ No□

- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes  $\square$  No $\boxtimes$
- D. If yes, please explain:

1.	BMP # F-3
2.	BMP Title: MS4 Maintenance Program
3.	<b>Provide the measurable goal from the Permit and/or approved SWMP:</b> Maintain 100% of structures listed as High Priority from the F-2 MS4 Inspection Program.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: <b>Existing program.</b> 170 total new MS4 Work Orders were created in 2020: 129 work orders opened in 2020 were closed (204 total WOs closed in 2020) and 41 2020 WOs remain open in 2020.
	B. Date(s) for any BMP activities completed during this reporting period: <b>Continuous</b>
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
	C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
	D. If yes, please explain:

1. **BMP # F-4** 2. **BMP Title:** Street and Parking Lot Cleaning 3. Provide the measurable goal from the Permit and/or approved SWMP: The City will submit a street sweeping log documenting street-miles cleaned and the tons of debris removed as shown on invoices, weight tickets or similar documentation. A. Did you comply with the measurable goal? Yes⊠ No□ B. If not, explain why you did not comply with the measurable goal: 4. **Documentation** A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□ B. If not, please explain why: 5. **Implementation Schedule** A. BMP activities completed during this reporting period: **Existing program.** The City contracted with AC Sweepers to conduct street sweeping for 2020. Over 303 curbmiles of City streets were swept collecting over 65.2 tons of sweepings. B. Date(s) for any BMP activities completed during this reporting period: Various C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□ D. If not, please explain why: **BMP Effectiveness** 6. A. Do you consider this BMP to be effective? Yes⊠ No□ B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□ C. Do you plan to revise the BMP description, implementation schedule, or measurable

D. If yes, please explain:

goal for this BMP? Yes□ No⊠

1.	BMP # F-5
2.	BMP Title: Employee Training
3.	Provide the measurable goal from the Permit and/or approved SWMP: Conduct one training session annually; and track the number of employees receiving training, the training dates and the subject of the training.
	A. Did you comply with the measurable goal? Yes⊠ No□
	B. If not, explain why you did not comply with the measurable goal:
4.	Documentation
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
	B. If not, please explain why:
5.	Implementation Schedule
	A. BMP activities completed during this reporting period: <b>Existing program.</b> IDDE training was provided to 6 staff and contract crew members in 2020.
	B. Date(s) for any BMP activities completed during this reporting period: July 19, 2019
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
	D. If not, please explain why:
6.	BMP Effectiveness
	A. Do you consider this BMP to be effective? Yes⊠ No□
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
	C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠
	D. If yes, please explain:

1.	BMP # F-6 (Table 4.2.6, BMP #F-6)					
2.	BMP Title: _Waste Disposal_					
3.	<b>Provide the measurable goal from the Permit and/or approved SWMP:</b> The City will submit a copy of the bill of lading or weight ticket from the landfill.					
	A. Did you comply with the measurable goal? Yes⊠ No□					
	B. If not, explain why you did not comply with the measurable goal:					
4.	Documentation					
	A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□					
	B. If not, please explain why:					
5.	Implementation Schedule					
	A. BMP activities completed during this reporting period: <b>Existing program.</b> More than 558 tons of right-of-way debris, landscaping debris, and parks generated waste were sent to landfills in 2020. Over 65.2 tons of street sweepings were collected from City streets in 2020.					
	B. Date(s) for any BMP activities completed during this reporting period: Various					
	C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□					
	D. If not, please explain why:					
6.	BMP Effectiveness					
	A. Do you consider this BMP to be effective? Yes⊠ No□					
	B. Do you plan to continue with implementation of this BMP or revise it in the SWMP Continue ■ Revise □					
	C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠					
	D. If yes, please explain:					

1. BMP # F-7 2. **BMP Title:** New Flood Management Projects 3. Provide the measurable goal from the Permit and/or approved SWMP: Report the number of plans reviewed annually where water quality impacts have been assessed. A. Did you comply with the measurable goal? Yes⊠ No□ B. If not, explain why you did not comply with the measurable goal: 4. **Documentation** A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□ B. If not, please explain why: 5. **Implementation Schedule** A. BMP activities completed during this reporting period: **Existing program.** 44 New Flood Management Projects with permanent water quality BMPs were submitted for review in 2020. 16 were approved, 27 were denied, and one remained in review at the end of the year. B. Date(s) for any BMP activities completed during this reporting period: Continuous C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□ D. If not, please explain why: 6. **BMP Effectiveness** A. Do you consider this BMP to be effective? Yes⊠ No□ B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□ C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes□ No⊠

D. If yes, please explain:

1. **BMP # F-8** 2. **BMP Title:** Existing Flood Management Projects 3. Provide the measurable goal from the Permit and/or approved SWMP: Perform and document the assessment and the assessment results for at least one existing permitteeowned flood management project each year. A. Did you comply with the measurable goal? Yes⊠ No□ B. If not, explain why you did not comply with the measurable goal: 4. **Documentation** A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□ B. If not, please explain why: 5. **Implementation Schedule** A. BMP activities completed during this reporting period: Existing program. The stormwater collection area for the Community Center at Lynwood Park was evaluated in 2020. The following attachment provides more information B. Date(s) for any BMP activities completed during this reporting period: Multiple. C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□ D. If not, please explain why: **BMP Effectiveness** 6. A. Do you consider this BMP to be effective? Yes⊠ No□ B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□ C. Do you plan to revise the BMP description, implementation schedule, or measurable

D. If yes, please explain:

goal for this BMP? Yes□ No⊠

- BMP # F-9
   BMP Title:
  - **BMP Title:** Municipal Facilities
- 3. **Provide the measurable goal from the Permit and/or approved SWMP:** Annually update the inventory of municipal facilities. Inspect 100% of the municipal facilities within a 5-year period.
  - A. Did you comply with the measurable goal? Yes⊠ No□
  - B. If not, explain why you did not comply with the measurable goal:

# 4. **Inventory and Inspection**

- A. Inventory
  - 1. Was an inventory of municipal facilities with the potential to cause pollution updated during the reporting period? Yes⊠ No□
  - 2. A copy of the inventory must be submitted with the annual report. Is the inventory attached? Yes⊠ No□
  - 3. If the inventory is not attached, explain why:
- B. Inspection
  - 1. Provide the total number of municipal facilities on the inventory: 1
  - 2. Provide the number of municipal facilities inspected during the reporting period: 1

#### 5. **Documentation**

- A. Did you attach documentation of the BMP activities completed during the reporting period? Yes⊠ No□
- B. If not, please explain why:

# 6. **Implementation Schedule**

- A. BMP activities completed during this reporting period: **Existing program.** In 2020, the Stormwater Manager completed a Municipal Facility Inspection Form, an inventory of municipal facilities, and facility inventory map
- B. Date(s) for any BMP activities completed during this reporting period: Continuous
- C. Did you comply with the implementation schedule in the SWMP? Yes⊠ No□
- D. If not, please explain why:

- A. Do you consider this BMP to be effective? Yes⊠ No□
- B. Do you plan to continue with implementation of this BMP or revise it in the SWMP? Continue⊠ Revise□
- C. Do you plan to revise the BMP description, implementation schedule, or measurable goal for this BMP? Yes⊠ No□
- D. If yes, please explain: Note: after consultation with EPD in 2019, it was determined that, in Brookhaven, the Public Works Yard was the only Municipal Facility having the potential for creation and discharge of pollutants into Waters of the State. Therefore, only the Public Works Yard remains on the inventory and will be inspected each year. This does not require a change in the BMP description.

# Enforcement Response Plan Section 4.3

- 1. You were required to develop an Enforcement Response Plan (ERP) and submit the document to EPD. Have you completed ERP development? Yes⊠ No□
- 2. If yes, provide the date of submittal to EPD: 2/15/2018
- 3. If no, explain the reason for the delay and provide the status of the ERP development:

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# **Impaired Waters Section 4.4**

1.	You are required to develop either an Impaired Waters Plan (population <10,000) or a Monitoring and Implementation Plan (population >10,000). Check which one you are required to develop:
	☐ Impaired Waters Plan
	☑ Monitoring and Implementation Plan
2.	For existing permittees, you were required to submit the relevant Plan to EPD by February 15, 2015. For new permittees (designated on March 7, 2014), you were required to submit the relevant Plan by February 15, 2018. Have you completed development of the Plan? Yes⊠ No□
3.	If yes, provide the date of submittal to EPD: 1/17/2020
4.	If no, provide the status of the Plan development:
5.	You are required to check the latest 305(b)/303(d) list to determine if newly listed waters are within your jurisdiction. Have you reviewed this list? Yes⊠ No□
6.	If newly listed waters have been identified, you must revise your Plan. If a Plan revision is required, provide the status and the projected date for submittal to EPD:

# **Sharing Responsibility Section 4.5**

1.	Are you sharing responsibility for implementation of any part of the SWMP with another entity? Yes⊠ No□
2.	If yes, provide the name of the entity: DeKalb County
3.	Are you performing tasks for another entity? Yes□ No⊠

5. If you answered "Yes" to either question #3 or #4, describe what tasks are being performed by which entity: DeKalb County is performing the monitoring outlined in the Impaired Waters Plan.

4. Is another entity is performing tasks on your behalf? Yes⊠ No⊠

6. You must provide a copy of a signed intergovernmental agreement. Was an agreement included with the SWMP? Yes□ No⊠

The City is in the process of obtaining the IGA from DeKalb County. The County is required to conduct the monitoring as part of its Consent Decree with EPD and EPA.