

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 Varnell
- B. Name of responsible official: Honorable Tom Dickson  
Title: Mayor  
Mailing Address: Post Office Box C  
City: Varnell State: GA Zip Code: 30756  
Telephone Number: 706/694-8800
- C. Designated stormwater management program contact:  
Name: Mr. Mike Brown  
Title: City Administrator  
Mailing Address: Post Office Box C  
City: Varnell State: GA Zip Code: 30756  
Telephone Number: 706/694-8800  
Email Address: mbrown@cityofvarnell.com
- D. Provide the river basin(s) to which your MS4 discharges: Coosa
- 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: 34.907 Longitude: - 84.9657

**2. Sharing Responsibility**

- A. Has another entity agreed to implement a control measure on your behalf?  
Yes X No     (If no, skip to Part 3)
- Control Measure or BMP:
1. Name of entity Whitfield County
  2. Control measure or component of control measure to be implemented by entity on your behalf:
    - Public Involvement (Stakeholder group, Conasauga River Cleanup)
    - Illicit Discharge (Outfall mapping, complaint handling)

- Erosion and Sedimentation control (plan review, site inspection, enforcement, complaint handling)
- Post-Construction (BMP mapping)
- Pollution Prevention (MS4 structure mapping, MS4 structure inspection and maintenance, new flood management projects)

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: Mike Brown Date: 5/21/2023

Signature:  Title: City Administrator

**Stormwater Management Program**

**Public Education and Outreach on Storm Water Impacts**

**Table 4.2.1(a) of the Permit**

**A. Best Management Practice (BMP) #1: Educational Material Distribution**

1. **Target audience:** General Public
2. **Description of BMP:** The City maintains a kiosk at City Hall containing educational materials with topics related to stormwater. The brochures are obtained from various sources, including the EPA, the Clean Water Campaign, and Whitfield County. The kiosk is stocked with a brochure at the beginning of the reporting period. City staff inventory the number of brochures at the end of the reporting period to determine the number of brochures picked up.
3. **Measurable goal(s):** Restock the kiosk to ensure 25 brochures are available at the beginning of each reporting period. Annually inventory the kiosk to determine the number of brochures distributed during the reporting period.
4. **Documentation to be submitted with each annual report:** An inventory listing the number of brochures picked up from the kiosk. A copy of the brochure.
5. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
6. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The number of pamphlets picked up will indicate the number of residents being educated about stormwater related topics and be indicative of the effectiveness of the BMP.

**B. BMP #2: Stormwater Webpage**

1. **Target audience:** General Public
2. **Description of BMP:** The City maintains an official website for disseminating information to the public. This page contains a Links and Resource tab that includes stormwater related educational materials from EPA and the Clean Water Campaign, covering topics such as stormwater pollution, household hazardous waste and erosion and sedimentation. The website also includes links to several stormwater related educational videos from YouTube. The website is periodically updated to include new stormwater related information. The website includes a contact number to report a stormwater related complaint and a button allowing the user to report a complaint through a website form. The City has the ability to track the number of visitors to the website. The website can be accessed at: <http://cityofvarnell.com/>
3. **Measurable goal(s):** Annually obtain analytics to track the number of visitors to the website during each month.
4. **Documentation to be submitted with each annual report:** Screenshot of the current stormwater webpage. Analytics showing the number of webpage views during the reporting period.
5. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
6. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Tracking the number of views will allow the City to determine if the webpage is effective in disseminating educational information to City residents.

**Public Involvement/Participation**

**Table 4.2.2 (a) of the Permit**

**A. BMP #1: Stakeholder Advisory Group**

1. **Target audience/stakeholder group:** General public
2. **Description of BMP:** Whitfield County hosts an annual stakeholder advisory group consisting of representatives from local governments, commercial businesses, industry, construction companies and developers, etc. The purpose of the group is to discuss county-wide stormwater program implementation and develop future stormwater policies. A representative from the City participates in the advisory group meeting.
3. **Measurable goal(s):** Participate in one stakeholder advisory group meeting annually.
4. **Documentation to be submitted with each annual report:** A sign-in sheet showing the number of participants. Copies of the meeting agenda and presentation.
5. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
6. **Person (position) responsible for overall management and implementation of the BMP:** Whitfield County
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The number of participants in the advisory group will allow the City to gauge the effectiveness of the BMP.

**B. BMP #2: Conasauga River Cleanup**

1. **Target audience/stakeholder group:** General public
2. **Description of BMP:** The Keep Dalton Whitfield Beautiful organization coordinates a Rivers Alive cleanup event on the Conasauga River in conjunction with the local governments each Fall. Multiple locations along the river are available for volunteers to conduct litter removal. The City participates in the event by assisting with preparation, advertisement, and active cleanup on the day of the event. The waste materials are collected, tallied and hauled for disposal by Whitfield County public works and Dalton public works.
3. **Measurable goal(s):** Participate annually in the river cleanup event.
4. **Documentation to be submitted with each annual report:** A log showing the number of sites cleaned, the number of participants and amount of trash collected. A copy of the flyer advertising the event.
5. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
6. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
7. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The number of participants in the cleanup event will allow a determination of BMP effectiveness.

**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.

## Illicit Discharge Detection and Elimination

### Table 4.2.3 (a) of the Permit

#### A. BMP #1 – Legal Authority

1. **Description of BMP:** The City adopted an Illicit Discharge Detection and Elimination ordinance on September 17, 2013. The ordinance provides the City with the authority to conduct inspections and monitoring, control illicit discharges and connections, and control illegal dumping and spills into the MS4. The ordinance also provides the legal authority to take enforcement action to eliminate illicit discharges and connections.
2. **Measurable goal(s):** Annually evaluate the existing ordinance and if necessary, revise the ordinance.
3. **Documentation to be submitted with each annual report:** If the ordinance is revised during the reporting period, a copy of the adopted ordinance.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): N/A
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The ability to take enforcement action and eliminate any illicit discharges or connections will provide an indication that the ordinance is effective.

#### SWMP Attachments:

- Illicit Discharge Detection and Elimination ordinance

**B. BMP #2 – Outfall Map and Inventory**

1. **Description of BMP:** The City maintains an updated map and inventory showing the location of all outfalls from the MS4 and the names and locations of all waters of the State that receive discharges from those outfalls. Each year, the City will update the map to reflect the addition of outfalls from new construction projects or developments. Additionally, the City will remove outfalls that have been reclassified or removed.
2. **Measurable goal(s):** Annually update the inventory and map showing the location of all outfalls from the MS4 and the names and locations of all waters of the State that receive discharges from those outfalls.
3. **Documentation to be submitted with each annual report:** The outfall map and inventory will be submitted with each annual report. The number of outfalls added or deleted, and the total number of outfalls will be provided in each annual report.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Continuous
  - d. Month/Year of each action (if applicable): Annually
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Maintaining an updated outfall map and inventory will allow the City to continually evaluate potential illicit discharge sources.

**SWMP Attachments:**

- Outfall inventory
- Outfall map



C. **BMP #3 – IDDE Plan**

1. **Description of BMP:** The City’s Illicit Discharge Detection and Elimination (IDDE) Plan consists of inspecting outfalls to ensure illegal dumping is not occurring, sampling any dry weather flow to determine if upstream facilities are discharging non-stormwater flows to the drainage system, and eliminating all identified illicit discharges.

The City inspects outfalls during a period of dry weather, which is defined as a period of precipitation of <0.1” per day within the previous 72 hours. The City inspects a minimum of 5% of the outfalls annually, with a goal of inspecting approximately 20% of the outfalls each reporting year. This ensures that 100% of the total outfalls are inspected within the 5-year permit term.

If a dry weather flow is encountered, the City implements investigative and follow-up procedures including the performance of field tests, sampling, and source tracing to identify any potential illicit discharges. If the source of an illicit discharge is identified as deriving from an adjacent MS4, the City will notify that MS4.

The City ensures all identified illicit discharges are eliminated. If necessary, the City implements enforcement procedures described in the Enforcement Response Plan (ERP) in accordance with Part 4.3 of the Permit. More detailed outfall screening, source tracing, and illicit discharge detection procedures are included in the IDDE Plan.

2. **Measurable goal(s):** The City will dry weather screen a minimum of 5% of the outfalls each reporting period, ensuring that 100% of the total outfalls are screened within the 5-year permit term. The City will investigate 100% of suspected illicit discharges and ensure that 100% of all identified illicit discharges are eliminated.
3. **Documentation to be submitted with each annual report:** The number and percentage of outfall inspections conducted during the reporting period and copies of completed outfall screening checklists. In addition, source tracing reports will be submitted for any outfalls with suspected illicit discharges.

4. **Schedule:**

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

5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
  
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** A reduction in the number of dry weather flows identified as illicit discharges over time will be an indication of BMP effectiveness.

**SWMP Attachments:**

- Illicit Discharge Detection and Elimination Plan
- Outfall inspection form

**D. BMP #4 – Education**

1. **Description of BMP:** The City maintains an official website for disseminating information to the public. This page contains a Links and Resource tab that includes stormwater related educational materials from EPA and the Clean Water Campaign, covering topics such as illicit discharges, stormwater pollution, household hazardous waste and erosion and sedimentation. The website also includes links to several stormwater related educational videos from YouTube. The website is periodically updated to include new stormwater related information. The website includes a contact number to report a stormwater related complaint and a button allowing the user to report a complaint through a website form. The City has the ability to track the number of visitors to the website. The website can be accessed at:  
<http://cityofvarnell.com/>
2. **Measurable goal(s):** Annually obtain analytics to track the number of visitors to the website during each month.
3. **Documentation to be submitted with each annual report:** Screenshot of the current stormwater webpage. Analytics showing the number of webpage views during the reporting period.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Tracking the number of views will allow the City to determine if the webpage is effective in disseminating educational information to City residents.

**E. BMP #5 – Complaint Response**

1. **Description of BMP:** Under the MOA, Whitfield County handles complaints on the City’s behalf. The City receives complaints from citizens through walk-ins and through telephone calls. The contact number is posted on the City’s website. These calls are forwarded to Whitfield County. In addition, complaints can be submitted using a form on the City’s website, which transmits the complaint to Whitfield County for handling. Complaints are documented in a database by the County, including such information as the complaint date, name and contact information for the complainant, the location and nature of the complaint, etc. The complaint is forwarded to the appropriate County department for investigation. The County investigates all complaints within 3 business days of receipt. If necessary, the County will take enforcement against the responsible party. The database is updated to show when the complaint is resolved.
2. **Measurable goal(s):** Refer 100% of complaints to the County for handling. The County will investigate 100% of complaints within 3 business days of receipt.
3. **Documentation to be submitted with each annual report:** A log showing the number of complaint calls received and listing specifics regarding the investigation and resolution of each complaint.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Continuous
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** Whitfield County
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Responding to complaints in a timely manner and resolving the complaints to the complainant’s satisfaction will result in a determination of BMP effectiveness.

**SWMP Attachment**

- Whitfield County complaint procedures

## Construction Site Stormwater Runoff Control

### Table 4.2.4 (a) of the Permit

#### A. BMP #1 – Legal Authority

1. **Description of BMP:** The City is certified as a Local Issuing Authority (LIA). As such, the City maintains a Soil Erosion and Sedimentation ordinance. The ordinance was last revised and adopted on February 20, 2018. The requirement to control waste at construction sites is addressed in this ordinance.

In accordance with the LIA requirements, the County, on behalf of the City, submits semi-annual reports to the Georgia Soil and Water Conservation Commission. The report covering the January- June period is submitted by July 30<sup>th</sup>. The report covering the July-December period is submitted by January 31<sup>st</sup> of the following year.

2. **Measurable goal(s):** Annually evaluate the existing ordinance and if necessary, revise the ordinance.

3. **Documentation to be submitted with each annual report:** If the ordinance is revised during the reporting period, a copy of the adopted ordinance.

4. **Schedule:**

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

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

6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The ability to properly regulate construction site activities will indicate that the ordinance is effective.

#### SWMP Attachments:

- Soil Erosion and Sedimentation ordinance

**B. BMP #2 – Site Plan Review Procedures**

1. **Description of BMP:** The City is certified as a Local Issuing Authority and remains in compliance with the Georgia Erosion and Sedimentation Control Act (GESA) of 1975, as amended. Accordingly, all developers are required to comply with the local Soil Erosion and Sedimentation ordinance and obtain a land disturbance permit prior to the start of any land disturbing activities that will disturb one (1.0) or more acres of land within the City limits.

The City has a Memorandum of Agreement with the Georgia Soil and Water Conservation Division (GSWCD) such that in-house plan reviews of Erosion, Sedimentation and Pollution Control (ES&PC) plans are performed. Through the MOA with Whitfield County, the City sends all ES&PC plans and plans submitted for Land Disturbance Activity (LDA) permits to the County for review. The County ensures 100% of all ES&PC plans are reviewed and approved prior to issuance of a LDA permit. The plans received and reviewed and their status (approved or denied) are tracked in a spreadsheet. A separate log is maintained for issued LDA permits.

2. **Measurable goal(s):** Ensure that 100% of site plans for projects disturbing 1.0 or more acres of land are reviewed and approved prior to issuance of a LDA permit.
3. **Documentation to be submitted with each annual report:** The City will provide a list of the site plans received; the number of site plans reviewed, approved or denied; and the total number of LDA permits issued during the reporting period.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): N/A
  - c. Frequency of actions (if applicable): On-going
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** Whitfield County
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The number of site plans reviewed and receiving approval will allow the City to gauge if the procedures are working or require modification.

**SWMP Attachments:**

- Construction site plan review procedures

**C. BMP #3 – Inspection Program**

1. **Description of BMP:** Under the MOA with the City, the County inspects all active construction sites within the City limits that have been issued a Land Disturbance Activity permit. Inspections usually will occur after the initial installation of construction site BMPs, during active construction, and after final stabilization. The inspection ensures that the sites are in compliance with the Manual for Erosion and Sediment Control in Georgia, including the design and installation of structural and non-structural BMPs. In addition, the County ensures that construction site waste is properly controlled. The County completes an inspection form each time and these inspections are entered into a spreadsheet for tracking.
2. **Measurable goal(s):** Conduct at least one inspection at each active construction site during the reporting period.
3. **Documentation to be submitted with each annual report:** The City will provide a list of active construction sites and the number and dates of inspections conducted on each site during the reporting period.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Continuous
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** Whitfield County
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Routine inspections of active construction sites will allow the verification of compliance with E&S regulations.

**SWMP Attachments:**

- Example inspection form



**D. BMP #4 – Enforcement Procedures**

1. **Description of BMP:** If an inspection of a construction site finds the site to be in non-compliance with the Soil Erosion and Sedimentation ordinance, the LDA permit holder will be notified. The County, on behalf of the City, implements enforcement procedures described in the ERP in accordance with Part 4.3 of the Permit and ensures all identified E&S violations are addressed. The types of enforcement actions available include verbal notice, Notice of Violation, Stop Work Order, and Citation. The inspector is allowed to use discretion in determining the appropriate enforcement action to address each violation.
2. **Measurable goal(s):** The County will take enforcement for 100% of E&S violations identified during construction site inspections.
3. **Documentation to be submitted with each annual report:** The City will provide documentation of any enforcement actions taken during the reporting period, including the number and type (e.g. Notice of Violation, Stop Work Order) and status (e.g. pending, resolved).
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): As needed
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** Whitfield County
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** This BMP will be considered effective if all E&S violations are addressed and resolved.

**E. BMP #5 – Complaint Response**

1. **Description of BMP:** Under the MOA, Whitfield County handles complaints on the City’s behalf. The City receives complaints from citizens through walk-ins and through telephone calls. The contact number is posted on the City’s website. These calls are forwarded to Whitfield County. In addition, complaints can be submitted using a form on the City’s website, which transmits the complaint to Whitfield County for handling. Complaints are documented in a database by the County, including such information as the complaint date, name and contact information for the complainant, the location and nature of the complaint, etc. The complaint is forwarded to the appropriate County department for investigation. The County investigates all complaints within 3 business days of receipt. If necessary, the County will take enforcement against the responsible party. The database is updated to show when the complaint is resolved.
2. **Measurable goal(s):** Refer 100% of complaints to the County for handling. The County will investigate 100% of complaints within 3 business days of receipt.
3. **Documentation to be submitted with each annual report:** A log showing the number of complaint calls received and listing specifics regarding the investigation and resolution of each complaint.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Continuous
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** Whitfield County
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Responding to complaints in a timely manner and resolving the complaints to the complainant’s satisfaction will result in a determination of BMP effectiveness.

**SWMP Attachments:**

- Complaint procedures

**F. BMP #6 – Certification**

1. **Description of BMP:** Under the MOA, the County handles the construction management program for the City. The County ensures that any staff involved in construction activities subject to the Construction General Permits, such as conducting plan reviews or E&S inspections, are trained and obtain the proper certification in accordance with the rules adopted by the GSWCC.
2. **Measurable goal(s):** Ensure that 100% of all staff involved in construction activities subject to the Construction General Permits are certified.
3. **Documentation to be submitted with each annual report:** Copies of GSWCC certification cards or printouts from the GSWCC website.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): As needed
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** Whitfield County
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The BMP will be determined to be effective if all staff involved in construction activities maintain current certification.

**Post-Construction Stormwater Management in  
New Development and Redevelopment**  
**Table 4.2.5 (a) of the Permit**

**A. BMP #1 – Legal Authority**

1. **Description of BMP:** The City maintains a Stormwater Management ordinance addressing post-development within the City’s code of ordinances. The ordinance addresses stormwater management and stormwater facilities, including the long-term maintenance of detention/retention ponds. The ordinance was last adopted on September 17, 2013. The ordinance includes the adoption of the latest edition of the Georgia Stormwater Management Manual and the Whitfield County local design manual. The ordinance provides the City with the authority to conduct inspections and take enforcement for the failure to maintain post-construction structures.
2. **Measurable goal(s):** Annually evaluate the Stormwater Management ordinance and if necessary, revise the ordinance.
3. **Documentation to be submitted with each annual report:** If the ordinance is revised during the reporting period, a copy of the adopted ordinance.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): NA
  - b. Implementation date (if applicable): N/A
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The ability to properly regulate post-construction structure design and maintenance will indicate the BMP is effective.

**SWMP Attachments:**

- Stormwater Management ordinance
- Whitfield-Dalton local design manual

**B. BMP #2 – Inventory**

1. **Description of BMP:** The City maintains an inventory of post-construction stormwater management structures (e.g. detention / retention ponds, underground detention) as follows:
  - All publicly-owned post-construction structures
  - Privately-owned structures designed after the December 9, 2008 deadline for adoption of the GSMM
  - Publicly-owned structures by other entities (e.g. Board of Education and other entities that the City has the legal authority to inspect) with construction completed after December 6, 2012.

The inventory includes information on the number and type of structures, and ownership (i.e. publicly-owned, privately-owned, publicly-owned by other entities). The inventory will be updated as new structures are completed or existing structures are identified.
2. **Measurable goal(s):** Update the inventory as new structures are completed or existing structures are identified, with the update to occur at least annually.
3. **Documentation to be submitted with each annual report:** An updated inventory of post-construction structures, including those structures added during the reporting period.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): As needed
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Maintaining an updated inventory will allow the City to ensure that post-construction structures are being inspected and maintained as needed.

**SWMP Attachments:**

- Inventory of detention/retention ponds

**C. BMP #3 – Inspection Program**

1. **Description of BMP:** The City conducts inspections of 100% of the post-construction stormwater management structures included on the inventory required by BMP #2 above, within the 5-year permit term. The City will ensure that at least 5% of the structures are inspected annually. The purpose of the inspection is to determine if the structure is functioning as designed or if maintenance is required. A pond inspection form is utilized. At a minimum, the inspector will check the pond inlets, outlets and the forebay (if present) for any sediment buildup that could restrict flow or any structural issues (e.g. erosion, scour). The side slopes and dam are inspected for structural integrity (e.g., erosion, rills, animal burrows) and vegetative growth (e.g. invasive species, bare spots, mowing needed). The bottom of the pond is checked for sediment build-up, algal growth, the presence of trash or debris, oil sheen, or ponding water. Finally, the outlet control structure is inspected for blockage, including sediment, trash, or vegetation.
2. **Measurable goal(s):** Inspect at least 5% of the post-construction structures on the inventory annually, with 100% of the structures inspected within the 5-year permit term.
3. **Documentation to be submitted with each annual report:** Copies of completed inspection forms and the number and percentage of the total structures inspected during the reporting period.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Inspections showing improved maintenance of stormwater management structures over time will indicate BMP effectiveness.

**SWMP Attachments:**

- Example pond inspection form

**D. BMP #4 – Maintenance Program**

1. **Description of BMP:** The City implements a long-term operation and maintenance program for post-construction stormwater management structures. Permittee-owned structures will be maintained by the City to the maximum extent practicable. Routine maintenance can consist of cutting grass, removing weeds from the fence line, clearing blockages from inlet or outlet pipes, or removing brushy growth and trees from the structure. The City contracts with a landscape company to mow and weed eat the pond at least once per month.

Privately-owned structures and publicly-owned structures owned by other entities are maintained by the owner. Those structures listed in the inventory in BMP #2 (i.e. privately-owned structures with construction completed after December 9, 2008, publicly-owned structures owned by other entities with construction completed after December 6, 2012) are required to enter into a maintenance agreement. The City maintains a list of executed maintenance agreements. This list is updated as new agreements are signed. If inspections of these structures identify maintenance deficiencies, then letters of violation are transmitted to the owners listing the deficiencies and setting a time frame for correction.

2. **Measurable goal(s):** Maintain 100% of permittee-owned structures after inspection indicates needed maintenance. Require executed maintenance agreements for all newly constructed post-construction structures that are privately-owned or publicly-owned by other entities. Notify owners of privately-owned or publicly-owned by other entities post-construction structures of any corrective action needed within 6 months of inspection.
3. **Documentation to be submitted with each annual report:** Copy of contract with landscaper to complete monthly pond maintenance on City-owned pond. For privately-owned structures or those publicly-owned structures owned by other entities, the City will provide a summary list of maintenance agreements, the total number of executed agreements and copies of letters notifying the structure owners of any required maintenance.

4. **Schedule:**

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

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

6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Properly maintained stormwater management structures within the City will indicate this BMP is effective.**

**SWMP Attachments:**

- City-owned pond maintenance contract
- O&M procedures, including example maintenance agreement
- List of maintenance agreements executed to date



**E. BMP #5 – GI/LID Program**

1. **Description of BMP:** The City developed a GI/LID program that includes background information on the MS4, the GI/LID structures allowed to be constructed within the City, and procedures for the inspection and maintenance of the GI/LID structures. This GI/LID program was submitted to EPD in 2020. The City will evaluate the GI/LID program each reporting period for any needed revisions.
2. **Measurable goal(s):** Annually evaluate the GI/LID program.
3. **Documentation to be submitted with each annual report:** If the GI/LID program is revised during the reporting period, then the revised program will be submitted for EPD review.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The consideration of GI/LID structures during the design and review of development plans will be an indication of BMP effectiveness.

**SWMP Attachments:**

- GI/LID Program

**F. BMP #6 – GI/LID Structure Inventory**

1. **Description of BMP:** The City will maintain an inventory of water quality-related GI/LID structures constructed after December 6, 2012, as structures are constructed. The inventory will include bioswales/vegetated swales, bioretention areas, pervious pavement, infiltration trenches/basins, green roofs, and any other structures the City deems are appropriate. The inventory includes City-owned, publicly-owned by other entities, and privately-owned non-residential GI/LID structures. The City will track the addition of new water quality-related GI/LID structures through the plan review process and will enter into maintenance agreements for any newly constructed GI/LID structures that are privately-owned or publicly-owned by other entities.
2. **Measurable goal(s):** Update the GI/LID structure inventory annually. Track the addition of new water quality-related GI/LID structures through the plan review process and ensure the structures are added to the inventory.
3. **Documentation to be submitted with each annual report:** Updated inventory of water quality-related GI/LID structures.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The addition of new GI/LID structures to the inventory will demonstrate that the City is maintaining an updated inventory.

**SWMP Attachments:**

- GI/LID inventory

**G. BMP #7 – GI/LID Structure Inspection Program**

1. **Description of BMP:** The City will conduct inspections and/or ensure inspections are conducted on the water quality-related GI/LID structures listed on the inventory required by BMP #6. Routine inspections are important to keep the structure functioning properly. The inspection will include checking for such things as structural problems, excessive ponding, excessive vegetative growth, erosion, sediment buildup, deterioration of pipes, clogging of inlet and outlets, etc. Due to the diversity in GI/LID structures that the City will consider, specific procedures on the inspection of each of these structure types cannot be described here. Therefore, the inspections will follow the guidance provided by the Georgia Stormwater Management Manual, Volume 2, Appendix E, Operations & Maintenance Guidance Document. Inspection forms are included in the City’s GI/LID program, required by BMP #5. If the inventory contains less than 5 structures, then the City will conduct at least one inspection during each reporting period. If there are more than five GI/LID structures, then the City will inspect at least 5% of the structures annually.
2. **Measurable goal(s):** Inspect either one GI/LID structure annually or if the inventory includes more than five structures, inspect 5% of the total structures annually. Ensure that 100% of the GI/LID structures are inspected within the 5-year permit term.
3. **Documentation to be submitted with each annual report:** The number and percentage of GI/LID structures inspected. Completed inspection forms for those structures inspected during the reporting period.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Completed inspection forms will demonstrate that the inspection program is effective.

**SWMP Attachments:**

- GI/LID inspection forms

**H. BMP #8 – GI/LID Structure Maintenance Program**

1. **Description of BMP:** The City will conduct maintenance on City-owned GI/LID structures as needed based on the results of structure inspections. Maintenance will include such things as removing excessive sediment, removing debris and litter from the inlet or outlet structures, mowing or maintaining vegetation, etc. The specifics regarding structure maintenance will follow the guidance provided by the Georgia Stormwater Management Manual, Volume 2, Appendix E, Operations & Maintenance Guidance Document. Maintenance performed will be tracked using a maintenance log.

For any existing publicly-owned structures owned by other entities and privately-owned non-residential GI/LID structures, the City will retain a list of agreements executed after December 6, 2017. The list of agreements will be updated as new maintenance agreements are executed. When inspections of these GI/LID structures indicate maintenance is needed, the City will transmit letters to the responsible parties notifying them of deficiencies and setting a corrective action date.

2. **Measurable goal(s):** Conduct maintenance on 100% of the City-owned GI/LID structures where inspections noted needed maintenance. Annually update the summary list of executed maintenance agreements for publicly-owned by other entities and privately-owned non-residential GI/LID structures. Notify owners of publicly-owned by other entities and privately-owned non-residential GI/LID structures of needed maintenance through letters transmitted within 6 months of a completed inspection.

3. **Documentation to be submitted with each annual report:** If any City-owned structures exist, then the number of City-owned structures maintained and maintenance log. An updated summary list of maintenance agreements for publicly-owned by other entities and privately-owned non-residential GI/LID structures and copies of any letters sent to these owners regarding needed maintenance.

4. **Schedule:**

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

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

6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Properly maintained GI/LID structures, whether City-owned or not, will indicate that this BMP is being properly implemented and is effective.

**Pollution Prevention/Good Housekeeping for Municipal Operations**

**Table 4.2.6 (a) of the Permit**

**A. BMP #1 – MS4 Structure Inventory and Map**

1. **Description of BMP:** The County assists the City in updating an inventory and map of the MS4 structures, including catch basins, ditches (miles or linear feet), City-owned detention/retention ponds and underground detention, and storm drain lines (miles or linear feet). The inventory and map will be updated as as-built drawings are received from completed developments, along with any previously unidentified structures found during field inspections.
2. **Measurable goal(s):** Annually update an inventory and map of the MS4 structures.
3. **Documentation to be submitted with each annual report:** An updated inventory and map, the number of structures added during the reporting period, and the total number of structures.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** Whitfield County
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The continual inventorying and mapping of the MS4 structures will ensure that the City is able to implement inspection and maintenance activities.

**SWMP Attachments:**

- MS4 inventory
- MS4 map

**B. BMP #2 – MS4 Inspection Program**

1. **Description of BMP:** Under the MOA with Whitfield County, the County conducts inspections on behalf of the City. The County inspects a portion of the MS4 structures each reporting period, ensuring that 100% of the MS4 is inspected within the 5-year permit term. The County will ensure that a minimum of 5% of the structures are inspected during each reporting period. During the inspections, the structure conditions are documented, such as any noted damage, debris present, sediment build-up, scouring or erosion, etc. The inspections of City-owned detention ponds are performed by the City and documented using a hard copy inspection form. The catch basins, ditches and pipes are inspected by the County using an application in the field that links to ArcGIS, allowing the creation of inspection attribute spreadsheets.
2. **Measurable goal(s):** Inspect a minimum of 5% of the structures annually, ensuring that 100% of the structures are inspected within the 5-year permit term.
3. **Documentation to be submitted with each annual report:** The number and percentage of the total structures inspected, and either completed inspection forms or inspection spreadsheets.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** Whitfield County
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Inspecting a minimum of 5% of the MS4 structures will demonstrate the BMP is effective.



**C. BMP #3 – MS4 Maintenance Program**

1. **Description of BMP:** The County conducts maintenance on the MS4 structures as needed on behalf of the City, in accordance with the Operation and Maintenance procedures. During the inspection of MS4 structures, the County will conduct routine maintenance, such as cleaning out a catch basin. If inspections of MS4 structures indicate more extensive maintenance is needed, the County prioritizes the structures requiring maintenance. Work orders are prepared for those MS4 structures requiring maintenance. Once the maintenance work is completed, the work orders are updated with information regarding the activities completed and the date(s) of completion. The work orders are tracked in a spreadsheet.
2. **Measurable goal(s):** Conduct maintenance on MS4 structures as needed on an annual basis.
3. **Documentation to be submitted with each annual report:** The number of each type of structure maintained and completed spreadsheets or work orders.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Continuous
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** A properly functioning MS4 will be indicative that this BMP is effective.

**SWMP Attachments:**

- Operation and Maintenance procedures

**D. BMP #4 – Street and Parking Lot Cleaning**

1. **Description of BMP:** The City and County conduct street and parking lot cleaning in an effort to remove litter and debris from roadways before it can enter the MS4 or waterways. The City cleans municipal parking lots. The County and City use community service crews to pick up litter along streets on weekends when labor is available. The City and County maintain a log of the number of bags of litter removed, which is then summarized on a monthly and yearly basis. All litter is disposed of in the local landfill.
2. **Measurable goal(s):** Conduct litter removal activities at least once during the reporting period.
3. **Documentation to be submitted with each annual report:** Log spreadsheet showing the monthly and yearly number of bags of litter removed.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Continuous
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** Cleaner streets and less debris in the MS4 will demonstrate BMP effectiveness.

**E. BMP #5 – Employee Training**

1. **Description of BMP:** The City conducts annual training for its employees. The purpose of the training is to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. The training will include, but not be limited to, such topics as stormwater pollution, good housekeeping at municipal facilities, illicit discharge detection, MS4 structure maintenance, construction site activities, and green infrastructure. The training will usually be in the form of on-line videos (e.g. YouTube) that are viewed by the employees. The training is documented using a sign-in sheet.
2. **Measurable goal(s):** Hold one employee training event annually
3. **Documentation to be submitted with each annual report:** A sign-in sheet showing the date of training and the topic(s) addressed.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The number of employees trained and an increased awareness of stormwater pollution among employees will demonstrate BMP effectiveness.

**F. BMP #6 – Waste Disposal**

1. **Description of BMP:** The County removes debris from the MS4 during maintenance activities on behalf of the City. The County and the City utilize community service crews to pick up litter from roadside ditches. The City also periodically picks up litter along roads. Under the MOA, the County collects the waste materials and litter and either recycles it at the local recycling yard or disposes of it at the local landfill.
2. **Measurable goal(s):** Ensure that 100% of debris and litter collected from streets and the MS4 structures is disposed of properly.
3. **Documentation to be submitted with each annual report:** Log showing the amount of litter collected and debris removed from the MS4.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Continuous
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The proper disposal of debris and litter will prevent the materials from entering the MS4 and receiving stream.

**G. BMP #7 – New Flood Management Projects**

1. **Description of BMP:** The City is certified as a Local Issuing Authority and remains in compliance with the Georgia Erosion and Sediment Control Act (GESA) of 1975, as amended. Under the MOA, the County conducts plan reviews and requires all new construction projects to comply with the Georgia Stormwater Management Manual and the City’s stormwater management ordinance. During the plan review stage, the County evaluates each project to determine water quality impacts and ensure compliance with the runoff reduction standard. If necessary, the County requires revision of the plan design. The County also reviews the design of any proposed flood management projects (i.e. detention/retention ponds) for improved pollutant removal and includes new structures on an inventory.
2. **Measurable goal(s):** Ensure that 100% of proposed projects are assessed for water quality impacts during the design phase.
3. **Documentation to be submitted with each annual report:** A list of plans reviewed during the reporting period that were assessed for water quality impacts, noting those plans that resulted in new flood management projects for improved water quality.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Continuous
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** Whitfield County
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** The list of plans reviewed each year that were evaluated for runoff reduction and that include new flood management projects will be an indication of BMP effectiveness.

**H. BMP #8 – Existing Flood Management Projects**

1. **Description of BMP:** The City is required to conduct an assessment of existing (i.e. those designed prior to the 2016 Georgia Stormwater Management Manual) City-owned flood management projects (e.g. detention and retention ponds) for potential retrofitting to address water quality impacts. The City only owns one pond at City Hall at the time of this SWMP development. The City utilizes an Existing Facility Water Quality Improvement Worksheet to conduct the evaluation. This worksheet consists of a flow chart format which assesses whether a retrofit is needed and if so, is the retrofit feasible (e.g. is there a possible retrofit, is land available, are funds available, etc.). If the evaluation determines that retrofitting of the existing structure is feasible, then the City will proceed with the retrofit design and installation. If an assessment has previously been performed on any of the City-owned structures using the 2016 GSMM, then an additional assessment will not be performed.
2. **Measurable goal(s):** Because the City owns less than 5 structures, 100% of the structures will be assessed during the 5-year permit term. However, if any of these structures were previously assessed prior to the December 6, 2022 permit effective date, using either the 2016 GSMM or an equivalent local design manual, then an additional assessment will not be performed during this permit cycle.
3. **Documentation to be submitted with each annual report:** A completed Existing Facility Water Quality Improvement Worksheet for each assessed structure and information on any retrofitting activities conducted during the reporting period. For structures previously assessed prior to the December 6, 2022 permit effective date, the City will provide documentation of the assessment and the status of any retrofitting activities with the 2023 annual report. The 2024-2027 annual reports will include a table listing the existing flood management structures, the date of assessment, the results of the assessment and the status of retrofitting activities.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): February 15, 2024
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): February 15, 2025 -2028
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator

6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: Assessing and retrofitting existing flood management projects will potentially result in improved water quality which will be verified through the impaired waters monitoring program.**

**SWMP Attachments:**

- Water Quality Improvement Worksheet

**I. BMP #9 – Municipal Facilities**

1. **Description of BMP:** The City maintains an inventory of municipal facilities with the potential to cause pollution. The inventory includes those municipal facilities owned by the City and located within the City limits. The inventory is updated annually.  
  
The City conducts inspections of the municipal facilities included on the inventory, so that 100% of the facilities are inspected within the 5-year permit term. The City utilizes an inspection form that includes general facility information (e.g. location of the facility, activities conducted at the facility, facility contact information) and specific facility information (e.g. potential pollutant sources, best management practices present, pollution prevention practices). During the inspection, if any problems are noted, then the facility representative is notified and necessary corrective actions are explained. An example inspection form is attached.
2. **Measurable goal(s):** Annually update the inventory of municipal facilities. Conduct inspections on at least 5% of the municipal facilities annually, ensuring that 100% of the facilities are inspected within the 5-year permit term.
3. **Documentation to be submitted with each annual report:** Updated inventory of municipal facilities. Completed inspection forms.
4. **Schedule:**
  - a. Interim milestone dates (if applicable): N/A
  - b. Implementation date (if applicable): On-going
  - c. Frequency of actions (if applicable): Annually
  - d. Month/Year of each action (if applicable): N/A
5. **Person (position) responsible for overall management and implementation of the BMP:** City Administrator
6. **How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit:** On-going inspections, including on-site education of facility personnel, should result in fewer pollution problems noted at the municipal facilities during subsequent inspections.

**SWMP Attachments:**

- Inventory of municipal facilities
- Example inspection form



## Appendix A

### Enforcement Response Plan

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: The program was submitted to EPD on May 22, 2018 – the EPD approval date is unknown.
  - B. If the ERP has not yet been approved, provide the date submitted to EPD: N/A
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.

## Appendix B

### Impaired Waters

**There are no impaired waters located within the City's jurisdiction.**

1. Population based on the latest U.S. Census: 2,179

Date of the latest U.S. Census used: 2020

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. 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.
4. 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.