



City of Sandy Springs, Georgia

Stormwater Management Plan (SWMP)

National Pollutant Discharge & Elimination System (NPDES)

Phase II Municipal Separate Storm Sewer System (MS4) Permit 2017

Submitted to:

Environmental Protection Division

Georgia Department of Natural Resources

Submitted to EPD: June 2018

Revision submitted to EPD: November 2018

Revision II submitted to EPD: January 2019

TABLE OF CONTENTS

ACRONYMS/DEFINITIONS	IV
EXECUTIVE SUMMARY	1
LOCAL WATERWAYS TO WHICH THE MS4 DISCHARGES	1
A. PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS.....	3
A.1. BMP: STORMWATER EDUCATION	3
A.2. BMP: STORMWATER WEBPAGE	5
A.3. BMP: STORMWATER BROCHURES.....	7
A.4. BMP: STORMWATER TARGETED BUSINESS/INDUSTRY OUTREACH	9
B. PUBLIC INVOLVEMENT / PARTICIPATION.....	10
B.1. BMP: STORM DRAIN DECAL LABELING.....	10
B.2. BMP: STREAM CLEANUPS	12
B.3. BMP: WORLD WATER MONITORING DAY	14
B.4. BMP: OPERATE A COMMUNITY CALL CENTER.....	15
C. ILLICIT DISCHARGE DETECTION AND ELIMINATION	16
C.1. BMP: ILLICIT DISCHARGE ORDINANCE ENFORCEMENT.....	16
C.2. BMP: MS4 OUTFALL INVENTORY	18
C.3. BMP: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PLAN	19
C.4. BMP: ILLICIT DISCHARGE EDUCATION	21
C.5. BMP: CITIZEN COMPLAINT RESPONSE	22
D. CONSTRUCTION SITE STORMWATER RUNOFF CONTROL	24
D.1. BMP: ENFORCE STATE MODEL EROSION & SEDIMENTATION CONTROL ORDINANCE.....	24
D.2. BMP: SITE PLAN REVIEW	26
D.3. BMP: EROSION & SEDIMENTATION (E&S) INSPECTIONS	27
D.4. BMP: ENFORCEMENT PROCEDURES FOR EROSION & SEDIMENTATION VIOLATIONS	29
D.5. BMP: CITIZEN COMPLAINT RESPONSE	30
D.6. BMP: EMPLOYEE E&S CERTIFICATION	32
E. POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT & REDEVELOPMENT ..	33
E.1. BMP: POST CONSTRUCTION STORMWATER MANAGEMENT ORDINANCE	33
E.2. BMP: STORMWATER CONTROL INVENTORY	35
E.3. BMP: STORMWATER FACILITY INSPECTION	36
E.4. BMP: STORMWATER FACILITY MAINTENANCE.....	38
E.5. BMP: GREEN INFRASTRUCTURE (GI) LOW IMPACT DEVELOPMENT (LID) STRUCTURE INVENTORY	40
E.6. BMP: GREEN INFRASTRUCTURE (GI)/ LOW IMPACT DEVELOPMENT (LID) PROGRAM	41
E.7. BMP: GI/ LID INSPECTION AND MAINTENANCE PROGRAM	42
F. POLLUTION PREVENTION/ GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS	44
F.1. BMP: MS4 INVENTORY	44
F.2. BMP: MS4 CONTROL STRUCTURE INSPECTION PROGRAM	46
F.3. BMP: MS4 MAINTENANCE	47
F.4. BMP: STREET SWEEPING AND LITTER PICK UP PROGRAM	48
F.5. BMP: EMPLOYEE TRAINING	49
F.6. BMP: WASTE DISPOSAL	50
F.7. BMP: NEW FLOOD CONTROL PROJECT ANALYSIS.....	51
F.8. BMP: EXISTING FLOOD CONTROL PROJECT ANALYSIS	52

F.9.	BMP: MUNICIPAL FACILITY INSPECTIONS.....	53
G.	ANNUAL PLAN IMPLEMENTATION	54
G.1.	EMERGENCY RESPONSE PLAN (ERP) REVIEW.....	54
G.2.	IMPAIRED WATERS PLAN (IWP) REVIEW	55

APPENDIX A: ORDINANCES

APPENDIX B: INVENTORIES & MAPS

APPENDIX C: IDDE PLAN

APPENDIX D: DETENTION POND INSPECTION & MAINTENANCE PROCEDURES

APPENDIX E: MS4 INSPECTION & MAINTENANCE PROCEDURES

APPENDIX F: STREET CLEANING PROCEDURES

APPENDIX G: POLLUTION PREVENTION TRAINING PROCEDURES

APPENDIX H: WATER QUALITY ASSESSMENT PROCEDURES

APPENDIX I: ENFORCEMENT RESPONSE PLAN

APPENDIX J: IMPAIRED WATERS PLAN

ACRONYMS/DEFINITIONS

BMPs	Best Management Practices
CIP	Capital Improvement Project
COSS	City of Sandy Springs
E&S	Erosion & Sedimentation
EOC	Emergency Operations Center
EPD	Georgia Environmental Protection Division
ERP	Enforcement Response Plan
ESPC	Erosion, Sedimentation & Pollution Control
GESA	Georgia Erosion & Sedimentation Act
GIS	Geographic Information System
GSMM	Georgia Stormwater Management Manual
GSWCC	Georgia Soil & Water Conservation Commission
IDDE	Illicit Discharge Detection & Elimination
LDP	Land Disturbance Permit
LIA	Local Issuing Authority
MNGWPD	Metropolitan North Georgia Water Planning District
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge & Elimination System
POC	Pollution of Concern
QA/QC	Quality Assurance/Quality Control
ROW	Right of Way
SOP	Standard Operating Procedure
SWCD	Soil and Water Conservation District
SWMP	Stormwater Management Plan
TSS	Total Suspended Solids

EXECUTIVE SUMMARY

The City of Sandy Springs (COSS) renewed its coverage under the National Pollutant Discharge and Elimination System (NPDES) Phase II Municipal Separate Storm Sewer System (MS4) Permit on December 6, 2017, as required by provisions of the Georgia Water Quality Control Act and the Federal Clean Water Act. This permit requires the development of a Stormwater Management Plan (SWMP), to address the following provisions of Section 4.2 Minimum Measures:

- Public Education and Outreach on Stormwater Issues
- Public Involvement/ Participation
- Illicit Discharge Detection and Elimination (IDDE)
- Construction Site Stormwater Runoff Control
- Post Construction Stormwater Management Control in New Development and Redevelopment
- Pollution Prevention/ Good Housekeeping for Municipal Operations

The NPDES Phase II MS4 Permit also requires that the SWMP continue to implement the following activities:

- Enforcement Response Plan (ERP)
- Impaired Waterway Monitoring and Implementation Plan

LOCAL WATERWAYS TO WHICH THE MS4 DISCHARGES

The City of Sandy Spring’s MS4 discharges to six major watersheds, including 1) Crooked Creek, 2) Heard’s Creek, 3) Long Island Creek, 4) Marsh Creek, 5) Nancy Creek, and 6) Sullivans Creek. All streams ultimately discharge into the Chattahoochee River Basin. Table 1 summarizes the 303(d) listed streams and their respective pollutants of concern within the COSS limits.

Table 1: Streams within the COSS listed on the Georgia 2016 303(d) List

Reach	County	Location	Extent (miles)	Pollutant of Concern	TMDL Approved	Source
Ball Mill Creek	Fulton/ DeKalb	Fulton /DeKalb	3	FC	Yes	Urban runoff
Chattahoochee River	Fulton/ Cobb	Morgan Fall Dam to Peachtree Creek	12	FC, FCG (PCBs)	Yes	Urban runoff Fish Consumption

Reach	County	Location	Extent (miles)	Pollutant of Concern	TMDL Approved	Source
						Guidelines due to PCBs.
Chattahoochee River	Gwinnett/Fulton/Cobb	Johns Creek to Morgan Falls Dam	17	FC	Yes	Urban runoff
Crooked Creek	Gwinnett	Tributary to Chattahoochee River	2	FC, Bio F	Yes	Urban runoff
Long Island Creek	Fulton	Headwaters to the Chattahoochee River	5	FC, Bio F	Yes	Urban runoff
Marsh Creek (aka March Creek)	Fulton	Headwaters to the Chattahoochee River	4	FC, Bio F	Yes	Urban runoff
Nancy Creek	Fulton/DeKalb	Headwaters to Peachtree Creek, Atlanta	16	FC, Bio F	Yes	Urban runoff

FC = Fecal Coliform; Bio F = Biota Impacted (Fish Community); FCG= Fish Consumption Guidance
 This document is intended for reference use only and does not replace Georgia’s official 2016 303(d) list. Any discrepancy or inconsistency between this document and the official 303(d) list should be resolved by referring to the official 2016 305(b)/303(d) list.

A. PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS

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

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.1(a) of the 2017 NPDES Phase II MS4 permit.

A.1. BMP: STORMWATER EDUCATION

Permit Section: 4.2.1(a)1

A.1.1. Target Audience

Residents of Sandy Springs

A.1.2. Description of BMP

The COSS will publish two articles/stories in the Sandy Springs E-Newsletter (or other local news medium) to inform the public of stormwater management topics and other local stormwater related issues. Topics will include, but are not limited to:

- Preventing Stormwater Pollution
- Reporting Illicit Discharges
- Proper Disposal of Hazardous Materials
- Good Housekeeping Measures for residential and commercial properties

These articles will also be available on the COSS website.

A.1.3. Measurable Goal(s):

- a. The COSS will publish two (2) articles/stories per year.

A.1.4. Documentation to be submitted with each annual report:

Each article published within the reporting year will be submitted with that year's annual report.

A.1.5. Schedule:

<i>Frequency of Actions:</i>	Articles/stories will be published twice per year
<i>Month/Year of Each Action:</i>	2018 – 2022

A.1.6. Person (position) responsible for overall management and implementation of the BMP:

Communications Director in coordination with the Public Works Stormwater Unit Manager

A.1.7. Rationale for choosing BMP and setting measurable goal(s):

The BMP provides information to the public on issues related to stormwater management in a format that they are more likely to view, i.e. City e-newsletters. Furthermore, because this information is generated twice per year, the COSS can keep the public up-to-date on new and developing issues related to stormwater.

A.1.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS tracks the number of emails on its e-newsletter distribution list. The Sandy Springs Times or other medium used can provide their distribution records.

A.2. BMP: STORMWATER WEBPAGE

Permit Section: 4.2.1(a)1

A.2.1. Target Audience

General public, businesses and industries

A.2.2. Description of BMP

The webpage is currently located at <http://www.sandyspringsga.gov/city-services/natural-resource-protection/stormwater>. (Note that from time to time the City updates their website and this address may change.) This webpage includes general information on stormwater pollution prevention, as well as more specific information including:

- Reporting of illicit discharges
- NPDES Phase II MS4 Information
- Stormwater Brochures
- Flood Management Program
- Watershed Improvement Studies/Plans
- Community Involvement Opportunities

The COSS will continue to monitor and update the information on this website on an annual basis. The COSS maintains an internal tracking mechanism to count the number of visitors that view and click on the Stormwater Webpage.

A.2.3. Measurable Goal(s):

- a. The COSS will review and update the information on the website once per year.
- b. The COSS will track the visitors to the COSS Stormwater Webpage and report annually.

A.2.4. Documentation to be submitted with each annual report

The number of times the webpage is viewed annually, as determined by counting the number of clicks from outside users, will be included in that year's annual report.

A.2.5. Schedule:

<i>Frequency of Actions:</i>	Update website as needed (review annually) Report webpage visitors annually
<i>Month/Year of Each Action:</i>	2018 – 2022

A.2.6. Person (position) responsible for overall management and implementation of the BMP:

Communications Director in coordination with the Public Works Stormwater Unit Manager

A.2.7. Rationale for choosing BMP and setting measurable goal(s):

The BMP provides information to the public on stormwater management related issues in an easily-accessible format, i.e. website. Furthermore, because this information is updated once per year, the COSS can keep the public up-to-date on new and developing issues related to stormwater.

A.2.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will maintain an internal tracking mechanism to count the number of visitors that view and click on the Stormwater Webpage.

A.3. BMP: STORMWATER BROCHURES

Permit Section: 4.2.1(a)1

A.3.1. Target Audience

General public, businesses and industries

A.3.2. Description of BMP

The COSS maintains a “green living” brochure designed to positively affect the behavior of citizens to reduce environmental contamination, particularly as it relates to stormwater. Topics include stormwater pollution, FOG, hazardous wastes and stream buffer protection.

The COSS will report annually on the number of brochures distributed (assumed to be the inventory of displayed brochures at City Hall at the opening of the reporting period minus the inventory of the brochures at the close of the reporting).

A.3.3. Measurable Goal(s):

- a. The COSS will track the number of brochures placed in common areas at City Hall and report annually on the number distributed. A minimum of 25 brochures will be displayed. The number of displayed brochures will be checked periodically during the reporting period and re-stocked as needed.

A.3.4. Documentation to be submitted with each annual report

The number of brochures distributed at City Hall will be reported annually (assumed to be the inventory of displayed brochures at City Hall at the opening of the reporting period minus the inventory of the displayed brochures at the close of the reporting).

A.3.5. Schedule:

<i>Frequency of Actions:</i>	Report number of brochures distributed annually
<i>Month/Year of Each Action:</i>	2018 – 2022

A.3.6. Person (position) responsible for overall management and implementation of the

BMP: Public Works Stormwater Unit Manager in coordination with the Front Desk Receptionist

A.3.7. Rationale for choosing BMP and setting measurable goal(s):

The BMP provides information to citizens on issues related to stormwater management.

A.3.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will track the number of brochures distributed. The information learned from reading the brochures can change stormwater behaviors.

A.4. BMP: STORMWATER TARGETED BUSINESS/INDUSTRY OUTREACH

Permit Section: 4.2.1(a)1

A.4.1. Target Audience

Targeted businesses and industries with the potential to pollute stormwater

A.4.2. Description of BMP

The COSS Stormwater Unit will partner with the Community Development Department and/or other City Departments to target education on stormwater pollution prevention techniques toward a specific business or industry. The COSS Stormwater Unit will select one business/industry annually such as; pool contractors, apartment complexes, realtors, etc. The targeted outreach may be in the form of a meeting or the distribution of brochures to the targeted industry (apartment complexes, service stations, restaurants, etc.).

A.4.3. Measurable Goal(s):

- a. The COSS will conduct outreach to a targeted industry group annually.

A.4.4. Documentation to be submitted with each annual report

The COSS will track either the number of attendees at the outreach meeting via list of attendees or the number of brochures distributed to members of the targeted industry group.

A.4.5. Schedule:

<i>Frequency of Actions:</i>	Annual Targeted Stormwater Interest Group Outreach
<i>Month/Year of Each Action:</i>	2018 – 2022

A.4.6. Person (position) responsible for overall management and implementation of the BMP:

The Public Works Stormwater Unit Manager in coordination with other City Departments, as appropriate.

A.4.7. Rationale for choosing BMP and setting measurable goal(s):

The BMP provides targeted information to specific business/industry groups on stormwater pollution prevention techniques. Where possible, the stormwater outreach will be in partnership with another City meeting for that business/industry group to maximize participation.

A.4.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will track the number of attendees through an attendee list or track the number of brochures distributed to the targeted business/industry group.

B. PUBLIC INVOLVEMENT / PARTICIPATION

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

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.2(a) of the NPDES Phase II MS4 permit.

B.1. BMP: STORM DRAIN DECAL LABELING

Permit Section: 4.2.2(a)1

B.1.1. Target Audience

Community groups, schools, local volunteer organization, and the general public

B.1.2. Description of BMP

The COSS storm sewer system includes approximately 4,725 catch basins. There are many citizens who do not know that whatever enters into these catch basins discharges into a local waterway. The storm drain labeling program educates the citizen volunteers on how stormwater flows throughout the storm system while the volunteers educate their neighbors.

Residents will be encouraged on the City's website to volunteer to label the City's storm drains with decals that read "No Dumping, Drains to River" (or similar message). The residents will pick up supplies for the drain decal labeling from the Keep North Fulton Beautiful facility or Sandy Springs City Hall. Volunteers will label the drains (per labeling instructions) in an area designated by the COSS Public Works Department and complete a log. The log will include the name of the volunteer (or the name of the volunteer group), number of volunteers, date decals are installed, location of decals installed by the group, and number of drains labeled with decals. Upon completion of their volunteer activity, the volunteers will return the supplies and log.

B.1.3. Measurable Goal(s):

- a. Install decals on storm drains on at least two events during the reporting period.

B.1.4. Documentation to be submitted with each annual report

A log of information from each decal labeling project, which will include the name of the resident leading the project or the name of the group, the area of where the decals are installed, the number of decals installed, and the date that they were installed.

B.1.5. Schedule:

<i>Frequency of Actions:</i>	Based on interest, annually at a minimum
<i>Month/Year of Each Action:</i>	2018 – 2022

B.1.6. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager

B.1.7. Rationale for choosing BMP and setting measurable goal(s):

The COSS has adopted this BMP to facilitate public participation in educating their neighbors regarding where stormwater flows after entering the catch basin. Storm drain decal labelling has been an effective tool in educating the public about stormwater runoff and its effects.

B.1.8. B.1.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:

The COSS maintains a log of all decals installed and the location of where they are installed. Throughout the years of implementing this BMP, the number of decals installed on the drains will increase.

B.2. BMP: STREAM CLEANUPS

Permit Section: 4.2.2(a)1

B.2.1. Target Audience

Community groups, such as a Watershed Alliance, schools, local volunteer organization and the general public

B.2.2. Description of BMP

The COSS will encourage stream cleanup events in the City’s watersheds. In coordination with COSS Stormwater staff, the volunteer organizations will select a date and a stream segment to be cleaned. A stream segment that has a safe entrance and exit with convenient parking at one end should be selected. Material removed from the streamside will be bagged and properly disposed. The bagged trash will be deposited at an agreed upon location by the volunteers for COSS contractors to collect and dispose of properly. The COSS and/or the volunteer organizations will advertise these events to the public through its website or other outreach avenues.

B.2.3. Measurable Goal(s):

- a. Hold one stream clean up per year.

B.2.4. Documentation to be submitted with each annual report

A written summary, which will describe the location of cleanup, approximate number of volunteers that participated, photograph(s), and an estimate of the number of trash bags collected, will be included in that year’s annual report.

B.2.5. Schedule:

<i>Frequency of Actions:</i>	One stream cleanup per year
<i>Month/Year of Each Action:</i>	2018 – 2022

B.2.6. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager

B.2.7. Rationale for choosing BMP and setting measurable goal(s):

Urban streams are often unnoticed and unappreciated as a natural resource. The object of having a streamside cleanup program is to facilitate public participation in stormwater decisions and planning while making the public aware of this natural resource and improving the health of our streams. Once streams are more visible to the public, the condition of the streams will become important and people will begin to behave in a manner that will improve the health of our streams.

B.2.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will be able to keep records of the number of bags of trash removed from the streams. This is a direct measurement of the effectiveness of this BMP in removing pollution.

B.3. BMP: WORLD WATER MONITORING DAY

Permit Section: 4.2.2(a)1

B.3.1. Target Audience

School children

B.3.2. Description of BMP

The COSS will hold a World Water Monitoring Day event with a local school or youth group. The students will learn how to test the water quality of a local waterway.

B.3.3. Measurable Goal(s):

- a. Participate in the annual World Water Monitoring Day with a local school.

B.3.4. Documentation to be submitted with each annual report

A written summary, which will include the location of World Water Monitoring Day event, photographs, and the number of attendees, will be included in that year's annual report.

B.3.5. Schedule:

<i>Frequency of Actions:</i>	One World Water Monitoring Day event per year
<i>Month/Year of Each Action:</i>	2018 – 2022

B.3.6. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager

B.3.7. Rationale for choosing BMP and setting measurable goal(s):

Educating youth on water quality issues today will create knowledgeable and responsible adults of the future.

B.3.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will track the number of students participating in the World Water Monitoring Day activities, which translates into a more educated future population.

B.4. BMP: OPERATE A COMMUNITY CALL CENTER

Permit Section: 4.2.2(a)1

B.4.1. Target Audience

General public

B.4.2. Description of BMP

The COSS will operate a call center by telephone (770-730-5600) where the general public can contact the COSS to report stormwater concerns such as spills, illegal dumping, and construction site erosion. COSS staff will field calls from the general public and refer issues to the proper personnel for follow-up.

B.4.3. Measurable Goal(s):

- a. Maintain a call center or similar mechanism for the general public to report stormwater concerns.

B.4.4. Documentation to be submitted with each annual report

The City's GIS department will generate a report to submit with the annual report. The report will note the number of calls received at the call center that have a "tag" in the call center system of stormwater or erosion.

B.4.5. Schedule:

<i>Frequency of Actions:</i>	Ongoing
<i>Month/Year of Each Action:</i>	2018 – 2022

B.4.6. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager

B.4.7. Rationale for choosing BMP and setting measurable goal(s):

The objective of call center is to provide a convenient method for the general public to participate in the City's stormwater program. The Call Center supports the COSS illicit discharge elimination program as well as the erosion and sedimentation control program by allowing the community to alert the City to local issues.

B.4.8. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS system records the number of calls received, type of calls, and where the call was routed. The public's participation is directly demonstrated by number of stormwater calls received.

C. ILLICIT DISCHARGE DETECTION AND ELIMINATION

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

- A) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls;*
- B) Effectively prohibit, through ordinance, or other regulatory mechanism, non-stormwater discharges into your storm sewer system and implement appropriate enforcement procedures and actions;*
- C) Develop and implement a plan to detect and address non-stormwater discharges, including illegal dumping, to your system; and*
- D) Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.*

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.3(a) of the NPDES Phase II MS4 permit.

C.1. BMP: ILLICIT DISCHARGE ORDINANCE ENFORCEMENT

Permit Section: 4.2.3(a)1

C.1.1. Description of BMP

The COSS has adopted the Metropolitan North Georgia Water Planning District's (MNGWPD) Model Illicit Discharge and Illegal Connection Ordinance. This ordinance prohibits non-stormwater discharges into the storm sewer system and establishes appropriate enforcement procedures.

C.1.2. Measurable Goal(s):

- a. Enforce 100% of the positively identified violations of the ordinance.
- b. The ordinance will be evaluated annually. If a change to the ordinance has been made, a copy of the updated ordinance will be included in the annual report.

C.1.3. Documentation to be submitted with each annual report

Documentation of violations will be submitted with each annual report along with a summary of enforcement actions. If a change to the ordinance has been made, the new ordinance will be submitted with the annual report.

C.1.4. Schedule:

<i>Frequency of Actions:</i>	As violations are identified
<i>Month/Year of Each Action:</i>	2018 – 2022

C.1.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director in coordination with Public Works Stormwater Unit Manager

C.1.6. Rationale for choosing BMP and setting measurable goal(s):

The COSS adopted the model IDDE ordinance on December 13, 2005 (see Appendix A for Enacted Ordinance).

C.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will submit the number and types of illicit discharges eliminated through enforcement of this ordinance in the annual report.

C.2. BMP: MS4 OUTFALL INVENTORY AND MAP

Permit Section: 4.2.3(a)2

C.2.1. Description of BMP

The COSS completed an initial inventory of the entire MS4, including outfalls, in 2009. The NPDES Phase II MS4 permit now defines an “MS4 Outfall” to be “the most downstream point (i.e. final discharge point) on an MS4 where it discharges to waters of the State.” This original inventory identified all outfalls, both MS4 outfalls, as defined by EPD, as well as outfalls within the MS4 (i.e. an end of a pipe that flows to another MS4 component). The COSS has been reviewing the current inventory of outfalls and identifying true MS4 outfalls, as defined by EPD, through GIS analysis and field confirmation. A map of the current inventory of MS4 outfalls is included in Appendix B. There are currently 625 MS4 outfalls.

C.2.2. Measurable Goal(s):

- a. Maintain and update the inventory and map of MS4 Outfalls.

C.2.3. Documentation to be submitted with each annual report

Each annual report will have an updated map and inventory of MS4 outfalls that require dry weather screening. The City will provide the number of outfalls added during the reporting period and the total number of outfalls in each annual report.

C.2.4. Schedule:

<i>Frequency of Actions:</i>	Update inventory as new outfalls are added and deleted, continue to reclassify outfalls as they are inspected during this permit cycle
<i>Month/Year of Each Action:</i>	2018 – 2022

C.2.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager

C.2.6. Rationale for choosing BMP and setting measurable goal(s):

The COSS needs an updated inventory of its MS4 outfalls to implement an effective dry weather screening program. Limiting outfall screening to those outfalls that meet current outfall definition, makes the most efficient use of City resources.

C.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will maintain the records of the number and types of illicit discharges eliminated through implementation of the dry weather screening program (BMP C.3.).

C.3. BMP: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PLAN

Permit Section: 4.2.3(a)3

C.3.1. Description of BMP

The COSS will implement its IDDE Plan, included in Appendix C, and perform screening of MS4 outfalls within its current inventory. The COSS will screen outfalls so that 100% of the inventoried MS4 outfalls are screened over a five-year period. The COSS will investigate any potential illicit discharges in accordance with the IDDE Plan. Should the COSS positively identify any illicit discharges, the COSS will implement the Illicit Discharge Ordinance for 100% of positively identified illicit discharges.

Suspect or obvious illicit discharges require follow-up actions and activities to determine the specific source(s) of contamination. There are a variety of methods for illicit discharge source identification/tracing, including: mapping analysis, drainage area investigation, piping schematic review, smoke testing, dye testing and septic system investigation. Once the illicit discharge is traced back to the source, the discharge will be eliminated. As stated within the IDDE Plan, the City's Community Development Department will enforce the applicable provisions of the Illicit Discharge Ordinance. Enforcement actions will be consistent with the COSS Enforcement Response Plan (ERP).

C.3.2. Measurable Goal(s):

- a. Dry weather screen 100% of mapped MS4 outfalls over the course of this permit period.
- b. Investigate and perform source tracing for 100% of all suspected illicit discharges.
- c. Enforce the Illicit Discharge Ordinance and ERP for 100% of positively identified illicit discharges.

C.3.3. Documentation to be submitted with each annual report

Each annual report will have inspection forms submitted during that year's reporting period. Information on illicit discharge detection, information on any eliminated discharges, and information on any enforcement actions taken to eliminate illicit discharges will be provided in each annual report.

C.3.4. Schedule:

<i>Frequency of Actions:</i>	100% of outfalls screened during permit cycle
<i>Month/Year of Each Action:</i>	2018 – 2022

C.3.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager in coordination with the Community Development Director.

C.3.6. Rationale for choosing BMP and setting measurable goal(s):

Dry weather screenings can be useful in identifying illicit discharges and sources. Appropriate corrective and enforcement actions will be taken if an illicit discharge is positively identified.

C.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will maintain the records of the number and types of illicit discharges investigated and eliminated through implementation of this BMP.

C.4. BMP: ILLICIT DISCHARGE EDUCATION

Permit Section: 4.2.3(a)4

C.4.1. Description of BMP

The COSS will continue to make information on illicit discharge prevention publicly available. The purpose of this BMP is to inform the public, employees, and businesses of the hazards associated with illegal discharges and how to prevent them in the household and/or workplace. The COSS will include educational information on illicit discharges on the stormwater webpage and will address illicit discharges in its stormwater articles, at least once per year. Educational materials will encourage residents to report illicit discharges and illicit dumping via the City Hall Citizen Response Center number. In addition, the COSS stormwater webpage includes a link to allow residents to report illicit discharges/dumping through the website. This BMP is closely related to the Public Education BMPs A.1 through A.4 and IDDE BMP C.5.

C.4.2. Measurable Goal(s):

- a. Evaluate the COSS webpage illicit discharge educational information annually and update as needed.

C.4.3. Documentation to be submitted with each annual report

Articles made publicly available on the COSS website will be submitted with each annual report. The number of times (clicks) the webpage is viewed will also be reported annually.

C.4.4. Schedule:

<i>Frequency of Actions:</i>	Annually
<i>Month/Year of Each Action:</i>	2018 – 2022

C.4.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager in coordination with the Communications Director

C.4.6. Rationale for choosing BMP and setting measurable goal(s):

Increase public awareness on the negative effects of illicit discharges into streams and how to prevent these occurrences.

C.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will establish an internal tracking mechanism to count the number of visitors that view and click on the Stormwater Webpage. This data will allow the COSS to track the number of visitors who view educational materials.

C.5. BMP: CITIZEN COMPLAINT RESPONSE

Permit Section: 4.2.3(a)5

C.5.1. Description of BMP

The COSS has implemented a program for receiving, investigating, and tracking the status of illicit discharge complaints.

Residents have the option to report issues via one of the following three methods:

1. COSS Website: There is a path to an interactive map that can be used to enter in a location or address. The COSS website also has a path entitled, "Request Assistance" that allows residents to report any complaint (a shared platform with erosion and sediment complaints).
2. Calling the 'call center': Complaints can be made by calling the City's Citizen Response Center at 770-730-5600, which receives calls 24 hours a day, seven days a week, or
3. Using the COSSpotter free smart phone app for Android, Blackberry or iPhone.

Outside of business hours, one of the 24-hour agents will enter the complaint into the City's work order database so it is available for action at the start of the following business day. All citizen complaints are directed to the appropriate department: Community Development or Public Works. Complaints are recorded by the COSS call center personnel using a computerized reporting system. Once the complaint is entered into the database system, the following occurs:

- The database is checked by the receiving department's administrative personnel. These personnel check the database several times throughout the day.
- If a mistake has been made in the initial routing of the call, the administrative personnel will immediately forward the complaint to the appropriate department.
- Each department has a technician assigned to field complaint response. These technicians will contact the complainant, typically within 72 hours.
- The technician responds by:
 - Conducting an immediate inspection
- Resolution of the complaint varies for each issue, but typically the complaint is resolved that same day, during that first week, or within two weeks, depending on the severity of the issue. Significant issues can take longer to completely resolve.

C.5.2. Measurable Goal(s):

- a. Investigate illicit discharge complaints within three (3) business days.
- b. Record illicit discharge complaints in the electronic database.

C.5.3. Documentation to be submitted with each annual report

Illicit discharge complaints as well as a summary of actions taken by the City to address the complaints will be compiled in an electronic database and reported annually.

C.5.4. Schedule:

<i>Frequency of Actions:</i>	As complaints are received
<i>Month/Year of Each Action:</i>	2018 – 2022

C.5.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director in coordination with the Public Works Stormwater Unit Manager

C.5.6. Rationale for choosing BMP and setting measurable goal(s):

Illicit discharges may be more easily identified and corrected by providing the public a way to report complaints.

C.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will maintain records of the number and types of illicit discharge complaints investigated and the number of illicit discharges eliminated through this BMP.

D. CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

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

- A) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance;*
- B) Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;*
- C) Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;*
- D) Procedures for site plan review which incorporate consideration of potential water quality impacts;*
- E) Procedures for receipt and consideration of information submitted by the public; and*
- F) Procedures for site inspection and enforcement of control measures.*

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.4(a) of the NPDES Phase II MS4 permit.

D.1. BMP: ENFORCE STATE MODEL EROSION & SEDIMENTATION CONTROL ORDINANCE

Permit Section: 4.2.4(a)1

D.1.1. Description of BMP

The COSS adopted Georgia's Model Erosion, Sedimentation and Pollution Control Ordinance (E&S Ordinance) with updates completed on February 7, 2017 to reflect most recent amendments to the Georgia Erosion and Sedimentation Act (GESA). The COSS also added language to the Litter Control Ordinance to provide for the control of waste at construction sites in August 2014.

The COSS is a Local Issuing Authority (LIA) and also has a Memorandum of Agreement (MOA) with the Fulton County Soil & Water Conservation District that allows the COSS to conduct the review and approval of erosion, sedimentation and pollution control (ESPC) plans for Land

Disturbance Permit (LDP) projects less than an acre. The COSS will continue to enforce this ordinance and update it as mandated by the State to maintain its LIA status.

D.1.2. Measurable Goal(s):

- a. The ordinance will be evaluated annually and revised as needed.

D.1.3. Documentation to be submitted with each annual report

If the ordinance is revised, the revised ordinance will be submitted with each annual report.

D.1.4. Schedule:

<i>Frequency of Actions:</i>	As needed
<i>Month/Year of Each Action:</i>	2018 – 2022

D.1.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director in coordination with the Public Works Stormwater Unit Manager

D.1.6. Rationale for choosing BMP and setting measurable goal(s):

This ordinance is needed to allow the COSS to implement an Erosion and Sedimentation Control Program. It is also required by the State that all LIAs adopt the model ordinance.

D.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will maintain records of the number of E&S enforcement inspections and the number of notices of violation issued through implementation of the ordinance in the City's permitting software.

D.2. BMP: SITE PLAN REVIEW

Permit Section: 4.2.4(a)2

D.2.1. Description of BMP

The COSS will conduct ESPC plan reviews for all development projects requiring an LDP and disturbing less than one (1) acre of land. The ESPC plans are reviewed by certified COSS staff (Level II Plan Reviewer). The EPD will conduct ESPC plan reviews for all development projects requiring an LDP and disturbing more than one (1) acre of land.

D.2.2. Measurable Goal(s):

- a. 100% of site plans for projects disturbing under one (1) acre of land will be reviewed by the COSS certified personnel.
- b. 100% of site plans for projects disturbing over one (1) acre of land will be reviewed by the EPD.

D.2.3. Documentation to be submitted with each annual report

A list of plans received and the number of plans reviewed, approved, or denied during the reporting period in each annual report.

D.2.4. Schedule:

<i>Frequency of Actions:</i>	As ESPC plans are submitted
<i>Month/Year of Each Action:</i>	2018 – 2022

D.2.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

D.2.6. Rationale for choosing BMP and setting measurable goal(s):

Utilizing the Georgia Soil and Water Conservation Commission (GSWCC) standardized checklist, and/or COSS checklist, whichever is most restrictive, to perform the plan review will ensure a consistent and comprehensive review process.

D.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

This BMP ensures that the ESPC plans submitted are compliant with state and local laws to minimize sediment from leaving the construction site. State law mandates that discharges from developing sites cannot increase the Total Suspended Solids (TSS) in the receiving stream by more than 25 Nephelometric Turbidity Units (NTUs) so implementation of the approved ESPC plan should achieve that water quality goal.

D.3. BMP: EROSION & SEDIMENTATION (E&S) INSPECTIONS

Permit Section: 4.2.4(a)3

D.3.1. Description of BMP

The COSS’s certified personnel conduct inspections of construction sites and enforce the requirements of the E&S Ordinance. All projects with an active LDP are inspected to ensure that proper E&S measures have been installed and maintained according to the approved ESPC plan. Inspectors visit the sites at the start of construction, periodically during construction including following storm events, when complaints are received, and after the site has been stabilized. Inspections are conducted by the Community Development Department by personnel certified in the fundamentals of E&S control. The lead inspector is required to have a Level II certification as a plan reviewer. Inspections are conducted following the *Field Manual for Erosion and Sediment Control in Georgia* (“Green Book”). If violations are discovered during an inspection, enforcement actions are taken in accordance with the E&S Ordinance included in Appendix A.

D.3.2. Measurable Goal(s):

- a. Active development sites with an LDP are inspected at the start and completion of land disturbance activities, and periodically during construction (such as after major rain events or based on complaints).

D.3.3. Documentation to be submitted in each annual report:

A list of covered construction site and inspections conducted from the City’s permitting software will be included in the annual report for that reporting year.

D.3.4. Schedule:

<i>Frequency of Actions:</i>	As LDP projects are constructed
<i>Month/Year of Each Action:</i>	2018 – 2022

D.3.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director in coordination with the Inspectors

D.3.6. Rationale for choosing BMP and setting measurable goal(s):

E&S inspections and enforcement of the ordinance will prevent excessive erosion and sedimentation associated with construction activities.

D.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

This BMP ensures that developers implement approved ESPC plans to prevent sediment from leaving construction sites in the COSS. State law mandates that discharges from developing sites cannot increase the TSS in the receiving stream by more than 25 NTUs so

implementation of the approved ESPC plan should achieve that water quality goal. The COSS will keep records of the number and nature of E&S violations that were discovered and addressed through implementation of this BMP through an enforcement log using the City's permitting software.

D.4. BMP: ENFORCEMENT PROCEDURES FOR EROSION & SEDIMENTATION VIOLATIONS

Permit Section: 4.2.4(a)4

D.4.1. Description of BMP

The COSS will implement enforcement procedures for E&S violations documented at construction sites in accordance with the E&S Ordinance and the Enforcement Response Plan (ERP). The ERP outlines the types of enforcement mechanisms available, process for escalation of enforcement, time frames for investigation, and the method to be used to track instances of non-compliance.

D.4.2. Measurable Goal(s):

- a. 100% of identified violations at construction sites will be addressed within 5 days.

D.4.3. Documentation to be submitted with each annual report

A log of enforcement actions with type (e.g., Notice of Violation, Stop Work Order) taken during the reporting period will be generated from the City's permitting software and included in each annual report.

D.4.4. Schedule:

<i>Frequency of Actions:</i>	Ongoing
<i>Month/Year of Each Action:</i>	2018 – 2022

D.4.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

D.4.6. Rationale for choosing BMP and setting measurable goal(s):

Effective enforcement of the COSS ordinances is necessary to protect water quality.

D.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will maintain records of E&S enforcement actions in the City's permitting software. These will be submitted to EPD in the Annual Report.

D.5. BMP: CITIZEN COMPLAINT RESPONSE

Permit Section: 4.2.4(a)5

D.5.1. Description of BMP

The COSS has implemented a program for receiving, investigating, and tracking the status of erosion and sedimentation complaints.

Residents have the option to report issues via:

1. COSS Website: There is a path to an interactive map that can be used to enter in a location or address. The COSS website also has a path entitled, "Request Assistance" that allows residents to report any complaint (a shared platform with erosion and sediment complaints).
2. Calling the 'call center': Complaints can be made by calling the City's Citizen Response Center at 770-730-5600, which receives calls 24 hours a day, seven days a week, or
3. Using the COSSpotter free smart phone app for Android, Blackberry or iPhone.

Outside of business hours, one of the 24-hour agents enter the complaint into the City's work order database so it is available for action at the start of the following business day. All citizen complaints are directed to the appropriate department: Community Development or Public Works. Complaints are recorded by the COSS call center personnel using a computerized reporting system. Once the complaint is entered into the database system, the following occurs:

- The database is checked by the receiving department's administrative personnel. These personnel check the database several times throughout the day.
- If a mistake has been made in the initial routing of the call, the administrative personnel will immediately forward the complaint to the appropriate department.
- Each department has a technician assigned to field complaint response. These technicians will contact the complainant, typically within 72 hours.
- The technician responds by:
 - Setting up an inspection appointment with the complainant
 - Automatically initiating a work order
 - Conducting an immediate inspection
- Resolution of the complaint varies for each issue, but typically the complaint is resolved that same day, during that first week, or within two weeks, depending on the severity of the issue. Significant issues can take longer to completely resolve.

D.5.2. Measurable Goal(s):

- a. Investigate E&S complaints within three (3) business days
- b. Record E&S complaints in the electronic database

D.5.3. Documentation to be submitted with annual report

A summary of the erosion and sedimentation complaints received and any related actions taken by COSS in each reporting year will be exported from the City's permitting software and submitted with the annual report.

D.5.4. Schedule:

<i>Frequency of Actions:</i>	As complaints are received
<i>Month/Year of Each Action:</i>	2018 – 2022

D.5.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director supported by the Public Works Stormwater Unit Manager

D.5.6. Rationale for choosing BMP and setting measurable goal(s):

E&S discharges may be more easily identified and corrected by providing residents a way to report complaints.

D.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will maintain the records of the number and types of E&S complaints investigated through implementation of this BMP.

D.6. BMP: EMPLOYEE E&S CERTIFICATION

Permit Section: 4.2.4(a)6

D.6.1. Description of BMP

GESA requires all local government employees involved with plan review, site inspections, or E&S Ordinance enforcement, as well as construction site operators to undergo the applicable training seminars developed by the GSWCC. The COSS also requires all construction site operators to provide evidence in their LDA Permit application that they have received the appropriate certification. Evidence of site personnel certification must also be produced if requested by COSS inspectors during an E&S inspection. The COSS also requires all applicable staff to receive this training as soon as possible after the start of their employment.

D.6.2. Measurable Goal(s):

- a. 100% of COSS employees involved in the E&S Program will receive applicable E&S certification.
- b. 100% of construction site operators with LDA permits will have applicable E&S certification.

D.6.3. Documentation to be submitted with each annual report

Number and type of certifications for applicable employees will be submitted with each annual report.

D.6.4. Schedule:

<i>Frequency of Actions:</i>	Ongoing
<i>Month/Year of Each Action:</i>	2018 – 2022

D.6.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director in coordination with the Public Works Director

D.6.6. Rationale for choosing BMP and setting measurable goal(s):

By requiring certification for COSS employees (inspectors and plan reviewers) and for construction site operators, the COSS will ensure that the ESPC plan is correctly designed and implemented on site.

D.6.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

This BMP ensures that E&S BMPs are installed correctly to prevent sediment from leaving the construction site. State law mandates that discharges from developing sites cannot increase the TSS in the receiving stream by more than 25 NTUs so implementation of the approved ESPC plan intends to achieve that water quality goal.

E. POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT & REDEVELOPMENT

40 CFR Part 122.34(b)(5) Requirement: You must develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your small MS4. You must:

- A) Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;*
- B) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development or redevelopment projects; and*
- C) Ensure adequate long-term operation and maintenance of BMPs.*

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.5(a) of the NPDES Phase II MS4 permit.

E.1. BMP: POST CONSTRUCTION STORMWATER MANAGEMENT ORDINANCE Permit Section: 4.2.5(a)1

E.1.1. Description of BMP

The COSS adopted the MNGWPD's Post Construction Stormwater Management Ordinance and the Georgia Stormwater Management Manual (GSMM) on December 9, 2008 with updates adopted in August 2016. This ordinance and design manual provide requirements for stormwater management plans as part of site design, and also set standards for design criteria. All construction activities that disturb more than 1,000 sq. ft. of area or create more than 1,000 sq. ft. of impervious surface are required to comply. The design criteria within the COSS ordinance are consistent with, or more stringent than, those listed in Section 4.2.5.1 of the NPDES Phase II MS4 permit.

E.1.2. Measurable Goal(s):

- a. Review 100% of stormwater management plans for all applicable projects.
- b. Enforce 100% of violations of the ordinance.
- c. Evaluate the ordinance annually.

E.1.3. Documentation to be submitted with each annual report

If the ordinance is revised during the reporting period, a copy of the newly adopted ordinance will be submitted with the annual report.

E.1.4. Schedule:

<i>Frequency of Actions:</i>	As site plans are submitted and violations are identified
<i>Month/Year of Each Action:</i>	2018 – 2022

E.1.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

E.1.6. Rationale for choosing BMP and setting measurable goal(s):

The COSS adopted the model Post Construction Stormwater Management ordinance and GSMM in 2005 with revisions in August 2016 (see Appendix A for enacted ordinance).

E.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Through the review of stormwater management plan design, the COSS will ensure that new and re-development projects comply with applicable post construction stormwater management requirements related to water quality.

E.2. BMP: STORMWATER CONTROL INVENTORY

Permit Section: 4.2.5(a)2

E.2.1. Description of BMP

The COSS maintains an MS4 inventory of stormwater controls/BMPs. This MS4 stormwater control inventory is contained in a GIS format, and a map is included in Appendix B. The MS4 database includes all publicly-owned stormwater structures and the privately-owned stormwater controls designed and constructed following the adoption of the GSMM on December 9, 2008. The COSS updates this inventory as new development and redevelopment occur. The database will also be updated if the COSS accepts the maintenance responsibility for any privately-owned structures.

E.2.2. Measurable Goal(s):

- a. Update inventory of stormwater controls as new development and redevelopment occur or if there is a change in maintenance responsibility for privately-owned stormwater structures constructed prior to December 9, 2008.

E.2.3. Documentation to be submitted in each annual report

As new structures are constructed or existing structures are identified during the reporting period, an updated inventory and map will be included on that year's annual report.

E.2.4. Schedule:

<i>Frequency of Actions:</i>	Ongoing
<i>Month/Year of Each Action:</i>	2018 – 2022

E.2.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager in coordination with Public Works GIS Developer/Analyst

E.2.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP provides the information necessary for the COSS to implement the Stormwater Control Inspection BMP E.3.

E.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Stormwater controls are supposed to be designed to remove 80% of TSS or more. Routine inspection and required maintenance ensure that ponds continue to function to meet this water quality goal.

E.3. BMP: STORMWATER FACILITY INSPECTION

Permit Section: 4.2.5(a)3

E.3.1. Description of BMP

The COSS has developed procedures for the inspection of detention ponds and other stormwater management facilities. The Stormwater Facility Inspection and Maintenance Procedures are included in Appendix D. Per the procedure, the COSS will inspect 100% of the MS4 inventoried ponds during the current permit period (2018 – 2022).

As the inventory is updated, the number of inspections will be modified to reflect the current number of MS4 stormwater facilities. When inspections indicate a violation or problem with a private detention pond, the COSS will contact the owner and notify them of the maintenance needed per the procedures. If an Inspection and Maintenance Agreement is in place, the COSS will enforce the provisions of that agreement. If an Inspection and Maintenance Agreement is not in place, the COSS will attempt to work with property owners to perform the necessary maintenance. If inspections indicate a violation or problem with a publicly owned or maintained pond, the COSS will maintain the pond as needed in accordance with the procedures.

E.3.2. Measurable Goal(s):

- a. Inspect 100% of MS4 stormwater facilities in the current inventory during this permit period (2018 -2022).

E.3.3. Documentation to be submitted with each annual report:

Inspection reports will be included with each year’s annual report.

E.3.4. Schedule:

<i>Frequency of Actions:</i>	Inspect 100% of MS4 Inventory of Stormwater Controls during the permit period
<i>Month/Year of Each Action:</i>	2018 – 2022

E.3.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager in coordination with the Community Development Director

E.3.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP allows the COSS to ensure that the MS4 stormwater controls are operating effectively to remove pollutants.

E.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Stormwater controls are designed to remove TSS. Routine inspection and appropriate maintenance confirm that ponds continue to function to meet this water quality goal and/or function in accordance with their design.

E.4. BMP: STORMWATER FACILITY MAINTENANCE

Permit Section: 4.2.5(a)4

E.4.1. Description of BMP

In order to compel the maintenance of privately-owned detention ponds or other stormwater facilities, the COSS adopted the MNGWPD Model Ordinance for Post-Construction Stormwater Management Control that requires private owners to maintain their structural controls. The ordinance requires the development of Inspection and Maintenance Agreements for all new stormwater facilities designed in accordance with the ordinance. A copy of this agreement is included in Appendix A. The COSS is granted the authority through the ordinance to inspect private stormwater facilities to ensure that they are being maintained in accordance with the Inspection and Maintenance Agreement. The City addresses privately-owned structures with constructions completed after December 9, 2008.

The COSS also has the responsibility to inspect and maintain 46 stormwater facilities/ponds that are either on COSS property or have been accepted by the COSS for maintenance. Maintenance is conducted in accordance with the standards for maintenance included in the GSMM. The COSS will perform maintenance activities on publicly-maintained ponds based on the results of the inspection and in accordance with the Procedures for Detention Pond Inspection & Maintenance. Maintenance may include clearing the debris screen and any other inlet and outlet structures, removing trash and sediment from the pond, and re-grading the sides if possible. Maintenance may also include structural maintenance to the inlet and outlet structures.

The COSS will not conduct maintenance on other publicly-owned stormwater structures not maintained by COSS) or on privately-owned structures.

E.4.2. Measurable Goal(s):

- a. Maintain COSS owned or COSS maintained stormwater facilities as needed and identified through inspections and as budget is available.
- b. Ensure that 100% of stormwater facilities, designed in accordance with the Post Construction Stormwater Management Ordinance and installed after December 9, 2008, have a Maintenance and Inspection Agreement.
- c. Notify private owners with Inspection and Maintenance Agreements of detention pond maintenance needs identified through inspection.

E.4.3. Documentation to be submitted with each annual report:

- a. For COSS-owned structures and COSS-maintained structures, a list of structures maintained, the type of maintenance performed, and documentation of maintenance activities will be provided in each annual report.
- b. For other publicly-owned stormwater structures (not maintained by COSS) and privately-owned and maintained structures, a summary list of

maintenance agreements and the total number of executed maintenance agreements will be provided in each annual report.

E.4.4. Schedule:

<i>Frequency of Actions:</i>	Annually, for City-maintained structures in accordance with inspection results and as budget is available
<i>Month/Year of Each Action:</i>	2018 – 2022

E.4.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director in coordination with Public Works Director

E.4.6. Rationale for choosing BMP and setting measurable goal(s):

By requiring developers/property owners to develop plans for inspecting and maintaining their detention ponds or other stormwater facilities through an Inspection and Maintenance Agreement, the COSS has the legal means to ensure that these facilities will be maintained and function properly after construction is complete.

E.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Stormwater controls are designed to remove TSS. Routine inspection and appropriate maintenance confirm that ponds continue to function as designed.

E.5 BMP: GREEN INFRASTRUCTURE (GI) LOW IMPACT DEVELOPMENT (LID) STRUCTURE INVENTORY

Permit Section: 4.2.5(a)5

E.5.1. Description of BMP

The COSS has an inventory of GI/LID structures within the COSS that includes those structures constructed after December 6, 2012. This inventory contains information on the type, location, and number of GI/LD structures such as bioretention, bio-swales, pervious pavement, green roofs, etc. The COSS will continue to update this inventory as new GI/LID structures are constructed.

E.5.2. Measurable Goal(s):

- a. Update inventory as new GI/LID structures are constructed.

E.5.3 Documentation to be included with each annual report:

The updated inventory, including those structures added during that year's reporting year, will be included in that year's annual report.

E.5.4. Schedule:

<i>Frequency of Actions:</i>	As new GI/LID structures are constructed
<i>Month/Year of Each Action:</i>	2018 – 2022

E.5.5. Person (position) responsible for overall management and implementation of the BMP:

Coordination with Recreation and Parks Director, Community Development Director and Public Works Stormwater Unit Manager

E.5.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP allows the COSS to identify the location of GI/LID structures.

E.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Each type of GI/LID practice has an estimated pollutant removal efficiency. By encouraging the incorporation of these types of practices in new and redevelopment, the COSS could estimate the amount of pollutants being removed through these practices. Furthermore, an inventory is necessary for inspection and maintenance purposes.

E.6. BMP: GREEN INFRASTRUCTURE (GI)/ LOW IMPACT DEVELOPMENT (LID) PROGRAM
Permit Section: 4.2.5(a)6

E.6.1. Description of BMP

The COSS will develop a GI/LID Program that describes how GI/LID structures will be evaluated, constructed and the procedures for the eventual inspection and maintenance of GI/LID on publicly-owned structures owned by other entities, and privately-owned non-residential structures. The GI/LID Program will be developed and submitted to EPD by February 15, 2020.

E.6.2. Measurable Goal(s):

- a. Develop a GI/LID Program by February 15, 2020 and submit to EPD.

E.6.3. Documentation to be included with each Annual Report:

If the GI/LID Program is revised during the reporting period, a copy of the revised GI/LID Program will be submitted with the annual report.

E.6.4. Schedule:

<i>Interim Milestone Date:</i>	Submit GI/LID Program to EPD by February 15, 2020
<i>Implementation Date:</i>	February 15, 2020
<i>Frequency of Actions:</i>	TBD
<i>Month/Year of Each Action:</i>	2020 – 2022

E.6.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director in coordination with the Public Works Stormwater Unit Manager

E.6.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP allows the COSS to plan for the eventual inspection and maintenance of non-residential GI/LID practices.

E.6.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The City currently has a sampling program in place to document water quality improvements.

E.7. BMP: GI/ LID INSPECTION AND MAINTENANCE PROGRAM

Permit Section: 4.2.5(a)7

E.7.1. Description of BMP

The COSS will conduct inspections and/or ensure inspections are conducted on GI/LID starting in 2020 and following the Inspections and Maintenance Program developed in BMP E.6. The COSS anticipates inspecting 100% of the COSS-owned and COSS-maintained GI/LID structures are inspected every 5 years. Further, COSS anticipates that other publicly-owned and privately-owned non-residential GI/LID structures will be inspected by the respective property owners, as well as by the City once every 5 years in accordance with the Permit.

If maintenance is needed for COSS-owned or COSS-maintained GI/LID structures based on the inspection reports, the COSS will perform the maintenance in accordance with procedures outlined in the GI/LID Program outlined in BMP E.6. If maintenance is needed for other publicly-owned structures or private non-residential structures, the COSS will follow the procedures outlines in BMP E.6 for communicating with those owners.

E.7.2. Measurable Goal(s):

- a. Inspect 60% of MS4 stormwater facilities in the current inventory during this permit period (2020 -2022).

E.7.3. Documentation to be included with each Annual Report:

Inspection reports will be included with each year’s annual report.

E.7.4. Schedule:

<i>Implementation Date:</i>	February 15, 2020
<i>Frequency of Actions:</i>	Inspect approximately 60% of the MS4 inventoried GI/ LID structures. Perform maintenance on City-maintained GI/LID structures as needed based on inspections and as funding is available.
<i>Month/Year of Each Action:</i>	2020 – 2022

E.7.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager

E.7.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP provides for the inspection and maintenance of non-residential GI/LID practices, so that they continue to remove pollutants and stormwater as designed.

E.7.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Each type of GI/LID practice has an estimated pollutant removal efficiency. The COSS inspection and maintenance program will ensure the amount of pollutants being removed through these practices is maintained.

F. POLLUTION PREVENTION/ GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

40 CFR Part 122.34(b)(6) Requirement: You must develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

The BMPs listed below address the requirements above in accordance with the guidelines included in Table 4.2.6(a) of the NPDES Phase II MS4 permit.

F.1. BMP: MS4 INVENTORY

Permit Section: 4.2.6(a)1

F.1.1. Description of BMP

The COSS maintains an inventory of MS4 control structures including, but not limited to catch basins, pipes, ditches, and detention/retention ponds (maintained in the inventory described in BMP E.2). This inventory is contained in a GIS format, and a map is included in Appendix B. The breakdown list of the structures by type is included in Appendix E. The COSS will continue to update this data as development and redevelopment occur. The COSS will also continue to refine this map to only include eligible MS4 structures as part of the inspection process (BMP F.2).

F.1.2. Measurable Goal(s):

- a. Update inventory of MS4 control structures as new development or redevelopment occurs.
- b. Continue to update the MS4 control structures to improve existing records based on inspection results (BMP F.2).

F.1.3. Documentation to be submitted with each annual report:

The number of structures added or removed during the reporting period and the total number of structures will be reported annually. An inventory and map will be provided with each year's annual report.

F.1.4. Schedule:

<i>Frequency of Actions:</i>	Ongoing, as new structures are added or data is improved
<i>Month/Year of Each Action:</i>	2018 – 2022

F.1.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager in coordination with Public Works GIS Developer/Analyst

F.1.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP provides the information necessary for the COSS to implement the MS4 Inspection and Maintenance BMPs.

F.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The MS4 system must function as designed in order to reduce pollutants discharged from the system. Routine inspection and appropriate maintenance ensure that the MS4 continues to function as designed to meet this water quality goal.

F.2. BMP: MS4 CONTROL STRUCTURE INSPECTION PROGRAM

Permit Section: 4.2.6(a)2

F.2.1. Description of BMP

The inventoried publicly-owned Municipal Separate Storm Sewer System (MS4) control structures will be inspected by the COSS. It is the COSS's intention to inspect each of the MS4 components listed in the MS4 inventory at least once every five years.

F.2.2. Measurable Goal(s):

- a. Inspect 100% of MS4 structures during the current permit period

F.2.3. Documentation to be submitted with each annual report:

The number of structures inspected during the reporting period will be included in each annual report. A summary report will be generated detailing which structures were inspected throughout each year of the reporting period. This report will be submitted with each Annual Report submittal.

F.2.4. Schedule:

<i>Frequency of Actions:</i>	Inspect approximately 20% of the MS4 structures annually
<i>Month/Year of Each Action:</i>	2018 – 2022

F.2.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager

F.2.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP allows the COSS to ensure that the MS4 is functioning properly and to reduce the pollutants discharged from the system.

F.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The MS4 must function as designed in order to reduce pollutants discharged from the system. Routine inspection and appropriate maintenance ensure that the MS4 continues to function to meet this water quality goal.

F.3. BMP: MS4 MAINTENANCE

Permit Section: 4.2.6(a)3

F.3.1. Description of BMP

The COSS will perform maintenance activities based on the results of the inspection, in accordance with the MS4 Inspection and Maintenance procedures in Appendix E. The COSS maintains the stormwater system within the right-of-way (ROW) and stormwater components and controls on property owned by the COSS or within an easement with an express acceptance by the COSS. Maintenance may include clearing debris, removing sediment, or re-grading ditches. Upgrades and/or structural maintenance on drainage structures may also be performed as needed.

F.3.2. Measurable Goal(s):

- a. Maintain MS4 structures as needed, and as funding is available

F.3.3. Documentation to be reported in each annual report:

A summary report will be generated summarizing which structures were maintained throughout each year of the reporting period. This report will be submitted with each Annual Report submittal.

F.3.4. Schedule:

<i>Frequency of Actions:</i>	Ongoing, based on inspection results and available funding
<i>Month/Year of Each Action:</i>	2018 – 2022

F.3.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager

F.3.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP allows the COSS to ensure that the MS4 is functioning properly and to reduce the pollutants discharged from the system.

F.3.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The MS4 must function as designed in order to reduce pollutants discharged from the system. Routine inspections and appropriate maintenance ensure that the MS4 continues to function to meet this water quality goal.

F.4. BMP: STREET SWEEPING AND LITTER PICK UP PROGRAM

Permit Section: 4.2.6(a)4

F.4.1. Description of BMP

The COSS has developed a program to keep litter and debris from being washed from the City's roadways into the MS4. This program consists of street sweeping an average of 260 miles of curb and gutter streets once a month or approximately 3,120 miles annually. This program is implemented in accordance with the Street Cleaning Procedures in Appendix F.

F.4.2. Measurable Goal(s):

- a. Sweep an average of 260 miles of roadway monthly, or 3,120 miles annually

F.4.3. Documentation to be submitted with each annual report:

A summary log, which will include miles and streets swept during that year's reporting year, will be included in the annual report.

F.4.4. Schedule:

<i>Frequency of Actions:</i>	Monthly
<i>Month/Year of Each Action:</i>	2018 – 2022

F.4.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Field Services Unit Manager

F.4.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will reduce the amount of litter and other pollutants being discharged from City streets into the MS4.

F.4.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will keep records of the miles of streets that are swept every year.

F.5. BMP: EMPLOYEE TRAINING

Permit Section: 4.2.6(a)5

F.5.1. Description of BMP

The COSS will continue to facilitate one (1) training session per year for COSS employees whose jobs keep them outside and mobile. The employee training session shall address stormwater related topics in an effort to ensure that employees are kept up to date with on-going changes in stormwater management. Representatives from the divisions within the Community Development and Public Works Departments are encouraged to attend the training sessions.

F.5.2. Measurable Goal(s):

- a. Conduct one employee training session per year

F.5.3. Documentation to be submitted with each annual report:

A sign-in sheet, including the date of any training conducted and the number of attendees, will be included in that year's annual report.

F.5.4. Schedule:

<i>Frequency of Actions:</i>	Annually
<i>Month/Year of Each Action:</i>	2018 – 2022

F.5.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Director in coordination with the Community Development Director

F.5.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will help prevent water quality impacts due to activities undertaken by employees during municipal operations and/or allow employees to identify and report potential stormwater issues.

F.5.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

Employee training will result in more stormwater issues being reported. Pollution may be reduced by conducting and documenting training.

F.6. BMP: WASTE DISPOSAL
Permit Section: 4.2.6(a)6

F.6.1. Description of BMP

The COSS will properly dispose of wastes including litter, debris, sediment, and other pollutants, removed from the drainage system during maintenance, street sweeping, litter pickup, or any other municipal activity. Waste will be disposed of in an active, permitted landfill.

F.6.2. Measurable Goal(s):

- a. Take 100% of waste removed from the MS4 to an active, permitted landfill.

F.6.3. Documentation to be submitted in each annual report:

Records of waste disposed of at the landfill will be included in the annual report.

F.6.4. Schedule:

<i>Frequency of Actions:</i>	As generated and/or collected
<i>Month/Year of Each Action:</i>	2018 – 2022

F.6.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Field Services Unit Manager and Public Works Stormwater Unit Manager

F.6.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP ensures wastes resulting from stormwater management activities are disposed of appropriately and prevented from re-entering MS4.

F.6.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will keep records of debris disposed of at the landfill.

F.7. BMP: NEW FLOOD CONTROL PROJECT ANALYSIS

Permit Section: 4.2.6(a)7

F.7.1. Description of BMP

The COSS ensures that all new flood control projects are assessed for water quality impacts. For the purposes of this BMP, the COSS interprets “Flood Control Projects” to refer to detention and retention ponds/basins. All new developments are currently required to comply with the COSS Post-Construction Stormwater Management Ordinance and GSMM, which require that stormwater management controls address water quality as well as water quantity protection (channel protection, overbank flood protection, and extreme flood protection).

F.7.2. Measurable Goal(s):

- a. Ensure 100% of new flood control projects comply with the COSS ordinance and GSMM.

F.7.3. Documentation to be submitted in each annual report:

The number of plans reviewed where flood management projects were assessed for water quality impacts during the reporting period will be submitted annually.

F.7.4. Schedule:

<i>Frequency of Actions:</i>	As plans are submitted
<i>Month/Year of Each Action:</i>	2018 – 2022

F.7.5. Person (position) responsible for overall management and implementation of the BMP:

Community Development Director

F.7.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will improve the water quality treatment potential of flood control projects throughout the COSS.

F.7.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The GSMM provides pollutant removal efficiencies for all types of detention/retention facilities constructed or retrofitted in accordance with the GSMM standards. The COSS will provide information in the annual report on the number of new ponds constructed in accordance with GSMM standards.

F.8. BMP: EXISTING FLOOD CONTROL PROJECT ANALYSIS

Permit Section: 4.2.6(a)8

F.8.1. Description of BMP

The COSS has developed procedures to assess existing flood control projects for the potential to retrofit for additional water quality protection. The Water Quality Assessment Procedures are included in Appendix H. For the purpose of this BMP, the COSS interprets “Flood Control Projects” to refer to detention and retention ponds/basins. The COSS will only review existing City-owned detention/retention ponds and assess the potential to retrofit these structures to incorporate additional measures to improve water quality treatment. The assessment will analyze the facility’s compliance to the COSS Post-Construction Stormwater Management Ordinance and GSMM which requires that stormwater management controls address water quality as well as water quantity criteria.

F.8.2. Measurable Goal(s):

- a. Assess one (1) existing flood control project per year.

F.8.3. Documentation to be submitted with each annual report:

A summary of the water quality assessment for the existing flood control project will be included in the annual report. The City will submit information on any assessment and/or retrofitting activities completed during the reporting period.

F.8.4. Schedule:

<i>Frequency of Actions:</i>	Annually
<i>Month/Year of Each Action:</i>	2018 – 2022

F.8.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Director and Public Works Stormwater Unit Manager

F.8.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP could improve the water quality treatment potential of existing flood control projects throughout the COSS.

F.8.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The GSMM provides pollutant removal efficiencies for all types of flood control projects constructed or retrofitted in accordance with the GSMM standards. The COSS will provide information in the annual report on the number of existing ponds assessed and the number of ponds retrofitted to meet GSMM standards.

F.9. BMP: MUNICIPAL FACILITY INSPECTIONS

Permit Section: 4.2.6(a)9

F.9.1. Description of BMP

The COSS will inspect 100% of the municipal facilities within a 5-year period. Additionally, COSS will update the inventory of all municipal facilities with the potential to contribute pollutants to the MS4 annually, as needed.

F.9.2. Measurable Goal(s):

- a. Inspect 100% of municipal facilities in the inventory within the 5-year period.

F.9.3. Documentation to be submitted with each annual report:

The inventory will be updated annually and submitted with each annual report. Facility inspection forms will be completed during each reporting period and will be included in each annual report.

F.9.4. Schedule:

<i>Frequency of Actions:</i>	Annually
<i>Month/Year of Each Action:</i>	2018 – 2022

F.9.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager

F.9.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP will prevent, or identify and remove, illicit discharges from municipal facilities.

F.9.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will maintain records of municipal facility inspections and any illicit discharges removed.

G. ANNUAL PLAN IMPLEMENTATION

The BMPs listed below address the requirements above in accordance with the guidelines included in Section 4.3 and 4.4.2 of the NPDES Phase II MS4 permit.

G.1. ENFORCEMENT RESPONSE PLAN (ERP) REVIEW

Permit Section: 4.3

G.1.1. Description of BMP

The COSS has an ERP that describes the actions associated with specific stormwater violations and related legal authorities (Appendix I). The COSS will continue to implement the ERP and review the ERP annually, making any revisions as needed. If revised, a copy of the updated ERP will be included in the annual report.

G.1.2. Measurable Goal(s):

- a. Review the ERP annually and revise as needed.

G.1.3. Documentation to be submitted with each annual report:

The ERP will be reviewed annually and if updated, a copy will be included in the annual report.

G.1.4. Schedule:

<i>Frequency of Actions:</i>	Annually
<i>Month/Year of Each Action:</i>	2018 – 2022

G.1.5. Person (position) responsible for overall management and implementation of the BMP:

Public Works Stormwater Unit Manager

G.1.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP outlines the processes and procedures to be followed if there are violations of the stormwater ordinances.

G.1.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will follow the ERP when stormwater violations are identified to provide for the efficient and fair resolution of these issues.

G.2. IMPAIRED WATERS PLAN (IWP) REVIEW

Permit Section: 4.4.2

G.2.1. Description of BMP

The COSS implements an IWP that identifies the waters classified as impaired on the Georgia EPD 303(d) list of impaired waters. The IWP describes the impaired streams and includes a monitoring and implementation component (Appendix J). The COSS will continue to implement the IWP. The COSS will review the IWP annually as well as the Georgia 303(d) list when released bi-annually, making any revisions as needed. If revised, a copy of the updated IWP will be included in the annual report.

G.2.2. Measurable Goal(s):

- a. Review the IWP for effectiveness annually and the Georgia 303(d) list bi-annually (when updated).
- b. Collect any monitoring data, as outlined in the IWP.
- c. Assess data trends of available data for the pollutant of concern for impaired waters that indicates whether the water quality is improving, declining, fluctuating, or remaining constant.
- d. Notify any upstream MS4 communities if data trends and/or results indicate that the source of pollution is in their community.
- e. Update the IWP as needed and, if updated, include a copy of the revised IWP with the Annual Report.

G.2.3. Documentation to be submitted with each annual report:

The IWP will be reviewed annually and if updated, a copy will be included in the annual report. A copy of any sampling data collected as required in the IWP will be submitted with the trend data in the annual report.

G.2.4. Schedule:

<i>Frequency of Actions:</i>	Annually
<i>Month/Year of Each Action:</i>	2018 – 2022

G.2.5. Person (position) responsible for overall management and implementation of the BMP: Public Works Stormwater Unit Manager

G.2.6. Rationale for choosing BMP and setting measurable goal(s):

This BMP targets the eventual restoration of waters that are on the state's 303(d) list of impaired waters. Actions to assess and better understand the sources of the pollutants of concern can lead to targeted solutions.

G.2.7. How will the City determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit

The COSS will assess the available water quality data to determine whether water quality in impaired streams is improving, declining, fluctuating, or remaining constant.