



Phase I Large MS4

Stormwater Management Program

For The

**National Pollutant Discharge Elimination System (NPDES)
Phase I Municipal Separate Storm Sewer Permit Reissuance**

Prepared for The

**City of Buford
Georgia**

December 5, 2019

Prepared By:



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Table of Contents

Stormwater Management Program (SWMP).....	3
1. General Information.....	3
2. Sharing Responsibility	3
3. Certification Statement	4
Structural and Source Control Measures	5
1. MS4 Control Structure Inventory and Map	5
2. MS4 Inspection and Maintenance Program	6
3. Planning Procedures	7
4. Street Maintenance	8
5. Flood Management Projects	9
6. Municipal Facilities Excluding Any Industrial Facilities	11
7. Pesticide, Fertilizer and Herbicide Application	12
Illicit Discharge Detection and Elimination (IDDE) Program	13
1. Legal Authority	13
2. Outfall Inventory and Map	14
3. IDDE Plan	15
4. Spill Response Procedures	16
5. Public Reporting Procedures	18
6. Proper Management and Disposal of Used Oil and Toxic Materials	19
7. Sanitary Sewer Infiltration Controls	20
Industrial Facility Storm Water Discharge Control.....	21
1. Industrial Facility Inventory	21
2. Inspection Program	22
3. Enforcement Procedures	23
4. Educational Activities	24
Construction Site Management.....	25

1. Legal Authority	25
2. Site Plan Review Procedures	26
3. Inspection Program	27
4. Enforcement Procedures	28
5. Certification	29
Highly Visible Pollutant Sources (HVPS).....	30
1. HVPS Facility Inventory	30
2. Inspection Program	31
3. Enforcement Procedures	32
4. Educational Activities	33
Public Education	34
1. Public Education – Educational Activity #1	34
2. Public Education – Educational Activity #2	35
3. Public Education – Educational Activity #3	36
4. Public Education – Educational Activity #4	37
Public Involvement	38
1. Public Involvement – Activity #1	38
2. Public Involvement – Activity #2	39
3. Public Involvement – Activity #3	40
4. Public Involvement – Activity #4	41
Post-Construction	42
1. Ordinance Review (Section 3.3.11(a)(1) of the Permit	42
2. Linear Transportation Project	42
Green Infrastructure/Low Impact Development (GI/LID)	43
1. Legal Authority	43
2. GI/LID Program.....	44
3. GI/LID Structure Inventory	45
4. Inspection and Maintenance Program	46

Appendix (I) Enforcement Response Plan (ERP)47
Appendix (K) Impaired Waters48
Appendix (L) Municipal Employee Training49

Appendices (Attached Flash Drive)

Appendix A

- Buford Catch Basin Inventory
- Buford Pond Inventory
- Buford MS4 Map 2019
- MS4 2019 Inventory Totals

Appendix B

- BMP Inspection Report
- Detention Pond Inspection Form Checklist
- Dry Outfall Screen Checklist
- Erosion Weekly Form
- Gwinnett Maintenance Agreement
- Stormwater Inspection Checklist Form
- Stormwater Structure Inspect Checklist
- Street Dept Monthly Report Log

Appendix C

- GSMM Detention Pond Maintenance
- Pesticide Fertilizer Herbicides SOP

Appendix D

- Buford 2040 Comprehensive Plan
- Buford Stormwater Management Plan

Appendix E

- Code and Ordinance Worksheet (COW) Form
- Conservation Subdivision Ordinance
- Erosion Control Ordinance
- Flood Prevention Ordinance
- Floodplain Management Ordinance Signed September 2018

Illicit Discharge Ordinance
Litter Control Ordinance
Post-Development Stormwater Ordinance
Stream Buffer Ordinance

Appendix F

Citizen Service Request
Citizen Service Request Database Screenshot
GC Hazard Spill Procedures
Household Hazardous Materials Brochure
Sanitary Sewer Maintenance Program
Used Motor Oil List 2019

Appendix G

Flood Management Project Checklist
GSWCC ESPCP Checklist

Appendix H

Buford Outfalls Map 2019
HVPS Inventory 2019
Industrial Facilities Inventory
Municipal Waste Facilities Inventory 2019
Outfall Inventory

Appendix I

Enforcement Response Plan Form
Enforcement Response Plan
IDDE Plan

Appendix J

Green Infrastructure / Low Impact Development Plan
Green Infrastructure / Low Impact Development Inventory

Appendix K

Big Creek IWP Fecal 120619
Impaired Waters Form
Richland Cr IWP Bio F 120619
Richland Cr IWP Fecal 120619

Suwanee Cr IWP Bio F 120619

Appendix L

Municipal Employee Training Form
Sample Bill Stuffers

STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Storm Water Management Program (SWMP)

1. General Information

- A. Name of MS4: *City of Buford*
- B. NPDES Permit Number: *GAS000104*
- C. Mailing Address (if providing a post office box, also provide a street address):
2300 Buford Highway
Buford, Georgia 30518
- D. Name of responsible official: *Bryan Kerlin*
Title: *City Manager*
Mailing Address: *2300 Buford Highway*
City: *Buford* State: *Georgia* Zip Code: *30518*
Telephone Number: *(770) 271-7987*
Email Address: *bkerlin@cityofbuford.com*
- e
- E. Designated stormwater management program contact:
Name: *Robbie Isaacs*
Title: *Industrial Pretreatment Director*
Mailing Address: *2300 Buford Highway*
City: *Buford* State: *Georgia* Zip Code: *30518*
Telephone Number: *(770) 271-7987*
Email Address: *risaacs@cityofbuford.com*
- F. Provide the river basin(s) to which your MS4 discharges: *Chattahoochee*
- G. 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°6'57.08"N* Longitude: *83°59'41.06"W*

2. Sharing Responsibility

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

SWMP Component:

1. Name of entity _____

2. SWMP component to be implemented by entity on your behalf:

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

3. **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: Bryan Kerlin

Date: 12-5-19

Signature: 

Title: City Manager

Structural and Source Control Measures
Table 3.3.1 of the Permit

1. MS4 Control Structure Inventory and Map

1. Description of SWMP Component: The City maintains a GIS-database that includes the stormwater system and its various components. The locations of the existing structures within the system have been GPS located and input into the City's database. The database will be updated based on new construction, stormwater infrastructure upgrades, annexations, and determinations that existing structures may have been overlooked. All structures currently mapped and inventoried within the City are included in the inventory and maps included in Appendix A.
2. Measurable Goal(s):
 - a. Provide an updated inventory and map of the City's MS4 control structures.
 - b. Update the inventory and map in each reporting period and summarize the number of structures that were added during each reporting period with the submittal of the Annual Report.
3. Documentation to be submitted with each Annual Report:
 - a. Current MS4 Control Structure Inventory
 - b. Current MS4 structure map(s)

2. **MS4 Inspection and Maintenance Program**

1. Description of SWMP Component (Ensure the text describes both the inspection and maintenance of the MS4 structures):
 - a. Inspections: The City of Buford will conduct inspections on approximately 20% of their inventoried structures per reporting period such that 100% of the structures will be inspected within the 5-year Permit term. Structures will be inspected for the presence of standing water, debris/litter, sediment buildup, and structural defects. A copy of the Stormwater Structure Inspection Checklist is included in Appendix B. The City uses the Stormwater Structure Inspections Checklist in both hard copy and electronic format through their Hiperweb software. The City is working to conduct all of the stormwater inspections through Hiperweb moving forward.
 - b. Maintenance: The City will maintain all City owned MS4 structures on an as-needed basis and as noted during routine inspections. Routine maintenance will include clearing of debris, cleaning, mowing, etc. Maintenance and repairs are prioritized based on the severity of damage. Maintenance and repair needs will be documented during routine inspections on the applicable inspection form being utilized for that inspection. Maintenance required on private stormwater structures and detention ponds will be the responsibility of the owner and will be enforced based on the measures set forth in a Maintenance Agreement. A copy of the Maintenance Agreement used by the City is included in Appendix B. In the event that a Maintenance Agreement is not in place, the City shall enforce measures to address the noted deficiencies on a case by case basis.
2. Measurable Goal:
 - a. Inspect approximately 20% of the inventoried structures per reporting period such that 100% of the City's jurisdiction is inspected within the 5-year Permit term.
3. Documentation to be submitted with each Annual Report:
 - a. Completed inspection forms for each MS4 structure inspected or Hiperweb generated table listing the inspections completed.
 - b. Notation of the total number and percentage of MS4 structures inspected during the reporting period.
 - c. Notation of the total number of MS4 structures maintained during the reporting period.

3. Planning Procedures.

1. Description of SWMP Component:

- a. The City of Buford completed its Comprehensive Plan, *Buford 2040*, in January 2019. The current plan outlines specific policies that are designed to protect the local quality of life, guide future land use, and provide the framework for the City's Zoning Ordinance. The Plan also includes goals and policies which apply directly or indirectly to issues of water quality. A copy of the *Buford 2040* is included in Appendix D.

2. Measurable Goal:

- a. Describe any changes made in regards to the Comprehensive Plan regarding stormwater during each reporting period.

3. Documentation to be submitted with each Annual Report:

- a. Updated Comprehensive Plan or Amendments regarding stormwater related changes.

4. Street Maintenance

1. Description of SWMP Component:

- a. In an attempt to reduce polluted runoff from local roadways within the City of Buford, the City collects litter and debris from approximately 76 miles of City streets and 46 intersections each year. Collection of litter and debris is primarily by manual labor, including sweeping, blowing, and shoveling. Collected trash and debris are properly disposed of in a designated landfill.
- b. The City completes roadway maintenance on City streets, including patching and curb and gutter replacement as needed. The City's primary procedure when repairing, cleaning, and maintaining streets is to disturb as little area as possible and to only conduct this work during dry weather conditions. All State and County routes are considered the responsibility of their respective entity and are not maintained by City staff.
- c. The City performs a limited amount of deicing on City streets. In the event that a storm occurs creating hazardous icy conditions on City streets, the City will apply sand-salt mixture to isolated areas. The Georgia Department of Transportation and Gwinnett County are responsible for deicing performed on their respective roadways within the City.
- d. The City has developed a Street Department Monthly Report and Maintenance Log to track the volume of litter and debris collected, ditches and streets cleaned, deicing material applied, and details of any road repair conducted. The Monthly Report form can be found in Appendix B.

2. Measurable Goal(s):

- a. Conduct a minimum of 1-mile of street sweeping per reporting period
- b. Maintain Monthly Reports to document street cleaning, litter collection, deicing material applied, and road repair conducted.

3. Documentation to be submitted with each Annual Report:

- a. Completed Monthly Reports documenting street cleaning, litter collection, deicing material applied, and road repair conducted.

5. **Flood Management Projects**

1. Description of SWMP Component:

a. Proposed Detention/Retention Ponds:

- i. The Post-Development Stormwater Management for New Development and Redevelopment Ordinance establishes rules to which new developments must comply with to control the quantity and quality of runoff leaving a site in order to replicate pre-development conditions. The assessment takes place during the plan review process and follows the guidelines established in the Georgia Stormwater Management Manual (GSMM). A copy of the Flood Management Project Design Checklist, used for this evaluation, can be found in Appendix G.

b. Existing Detention/Retention Ponds:

- i. The City of Buford conducts routine inspections of stormwater detention ponds throughout the City as required by the MS4 Permit. While conducting these assessments, the City staff also seeks to identify the presence of water quality impacts due to the condition of the existing outlet control structures. Should the City identify an opportunity for a retrofit that would provide a potential positive benefit to the water quality, the City will perform an assessment to identify the water quality impacts from the existing control device as well as the recommended course of action to correct the issue. The City also periodically conducts such assessment on private owned detention/retention ponds as well. When opportunities for retrofit on privately-owned ponds are identified and assessed by City staff, the assessment will be provided to the property owner. The City will follow the same standards for required maintenance as set forth in the Maintenance Agreement (see Appendix B) for privately-owned facilities. A copy of the City of Buford Operation and Maintenance Inspection Report for Stormwater Management Detention Pond checklist can be found in Appendix B. The City uses the Inspection Report in both hard copy and electronic format through their Hiperweb software. The City is working to conduct all of the stormwater inspections through Hiperweb moving forward.

2. Measurable Goal(s):

- a. Conduct assessments on new development and redevelopment within the City per guidelines established in the GSMM.
- b. Conduct an assessment on a minimum of one (1) City-owned detention/retention pond each reporting period such that 100% of the City-owned detention/retention ponds are inspected within the 5-year permit period.

3. Documentation to be submitted with each Annual Report:
 - a. Provide the number of development and redevelopment plans reviewed where flood management projects were assessed for water quality impacts.
 - b. Provide information on any assessments or retrofitting conducted on City-owned detention/retention ponds.

6. **Municipal Facilities Excluding Any Industrial Facilities (Addressed in Permit Section 3.3.3)**

1. Description of SWMP Component:

a. Inventory:

- i. The City owns and operates two facilities that meet the criteria stated in the Permit for municipal facilities with the potential to cause pollution. The Municipal Facilities Inventory is included in Appendix A. The City's Southside Wastewater Treatment Plant and Public Works Facility both fall under the Industrial General Permit and are not listed in the Municipal Facilities Inventory.

Should be one!

Should be Appendix
H not A

b. Inspection:

- i. The City routinely inspects these facilities as a good housekeeping measure. The inspections will comply with the requirement that 100% of the inventory will be inspected at least once within the 5-year permit period. Should the inventory expand to 5 or more facilities, the City will inspect a minimum of 5% of the facilities inventoried each reporting period. The City uses the Stormwater Inspection Checklist included in Appendix B for the inspections of municipal facilities with the potential to cause pollution. The City uses the Checklist in both hard copy and electronic format through their Hiperweb software. The City is working to conduct all of the stormwater inspections through Hiperweb moving forward.

2. Measurable Goal(s):

- a. The City will update the inventory of municipal facilities as required during each reporting period.
- b. The City will conduct inspections at frequencies noted above as required by the Permit.

3. Documentation to be submitted with each Annual Report:

- a. Provide an updated inventory of the municipal facilities with the potential to cause pollution.
- b. Provide documentation of inspections and documentation of follow-up actions taken to address non-compliance issues.

7. **Pesticide, Fertilizer, and Herbicide Application**

1. Description of SWMP Component:

- a. Commercial Applicators and Distributors: The City of Buford relies heavily on the State Department of Agriculture (DoA) and Gwinnett's Cooperative Extension Service (CES) for assistance in addressing requirements for PFH application and certification. The State DoA requires commercial applicators of pesticides and herbicides to obtain and retain a "Commercial Pesticide Applicators License." The State DoA also requires that distributors of restricted pesticides obtain and retain "Distributor Licenses." Continuing education units are required each year to maintain the license

The CES provides training opportunities to homeowners, private applicators, commercial applicators, and municipal applicators that desire education on the appropriate management and use of pesticides. This training (though not required for state DoA licensing) is designed to assist persons in passing the state exam, which is required to obtain a license. Programs offered to the public by CES generally include Landscape Professionals Training, Commercial Pesticide Applicators Training, Pesticide Safety and Use, and Satellite Pesticide Conference. These programs contain information that addresses the potential impacts on water quality associated with the misuse of PFH application.

- b. Municipal Use of Pesticides, Fertilizers, and Herbicides (PFH): City use of pesticides, fertilizers and herbicides is limited to 10-10-10 fertilizer (or similar) for use in parks and recreational areas and "Round Up" for use in controlling kudzu and other weeds. To prevent accidental spillage, herbicides are mixed at the Public Works Facility and then transported to locations to be treated. Crew Supervisors in charge of herbicide application are well versed in SOPs. Herbicide application occurs mainly during the growing season. A SOP for the use of Pesticides, Herbicides and Fertilizers is included in Appendix C of the SWMP.

2. Measurable Goal(s):

- a. The City will rely on the Gwinnett County CES for assistance in PFH training and certification.

3. Documentation to be submitted with each Annual Report:

- a. The City will provide an updated copy of the SOP for the use of PFH should the SOP require updates within the reporting period.

Illicit Discharge Detection and Elimination Program (IDDE)
Table 3.3.2 of the Permit

1. Legal Authority

1. Description of SWMP Component:

- a. The City of Buford adopted the Illicit Discharge and Illegal Connection Ordinance on April 1, 2004. This Ordinance gives the City the legal authority to conduct inspections and enforce deficiencies related to incidents of illicit discharges or illegal connections. A copy of the Ordinance is attached in Appendix E.

2. Measurable Goal(s):

- a. The City will submit a revised copy of the Illicit Discharge and Illegal Connection Ordinance with the Annual Report should revisions be required and approved by City Commission.

3. Documentation to be submitted with each Annual Report:

- a. The City will submit a revised copy of the Illicit Discharge and Illegal Connection Ordinance along with the corresponding Annual Report should the Ordinance require revision during the term of the Permit.

2. Outfall Inventory and Map

1. Description of SWMP Component:

- a. The City maintains a database and map of all outfalls within the City's jurisdiction. An inventory and map of the current identified Outfalls are located in attached Appendix H. The inventory and map will be updated on an annual basis as new outfalls are added or are identified. Any updates will be included in the Annual Report.

2. Measurable Goal(s):

- a. The City will continually review and update the Outfall Map and Inventory as new Outfalls are added or existing Outfalls are identified.
- b. The City will note the current number of Outfalls within each Annual Report.

3. Documentation to be submitted with each Annual Report:

- a. The City will provide an updated copy of the Outfall Map and Inventory with each Annual Report should revisions be required within the reporting period.

3. IDDE Plan

1. Description of SWMP Component (Ensure the text discusses the outfall inspections, any stream walk activities, illicit discharge tracing, and illicit discharge elimination):
 - a. The City has prepared an IDDE Plan that encompasses the IDDE Ordinance, inspection, screening, and investigation procedures. A copy of the IDDE Plan can be found in Appendix I. The City conducts dry weather screening (DWS) inspections on approximately 20% of the outfalls per reporting period such that 100% of the outfalls are screened within the 5-year permit term. Inspections follow the procedures as outlined in the SWMP and IDDE Plan. Should the inspection/screening find evidence of dry weather flow, the City will work to trace the source(s) of illicit discharge in accordance with the Enforcement Response Plan (ERP) (Appendix I) and the IDDE Plan. The form utilized for DWS can be found in Appendix B. The City uses the DWS form in both hard copy and electronic format through their Hiperweb software. The City is working to conduct all of the stormwater inspections through Hiperweb moving forward.
2. Measurable Goal(s):
 - a. Conduct Dry Weather Screening (DWS) inspections on approximately 20% of the outfalls per reporting period such that 100% of the outfalls are inspected within the 5-year permit term.
3. Documentation to be submitted with each Annual Report:
 - a. Provide the number and percentage of outfalls inspected during each reporting period.
 - b. Provide completed inspection forms for each DWS during each reporting period or Hiperweb generated table listing the inspections completed.
 - c. Provide documentation of any illicit discharges and tracing activities used to identify the source(s) during the reporting period.
 - d. Provide documentation on any eliminated discharges or enforcement actions taken for illicit discharges during the reporting period.

4. **Spill Response Procedures**

1. Description of SWMP Component:

a. Hazardous Material Spill Response: Gwinnett County's HazMat team is contacted in response to any hazardous material spills that may occur within the City's jurisdiction. A copy of their procedure is attached in Appendix F. Records of spills attended by Gwinnett County HazMat are held by the Gwinnett County Fire Department and are stored within a computer database. It should be noted that Gwinnett HazMat staff does not accept responsibility for clean-up; however, the team facilitates clean-up through contractors. Spill responses are handled in the following manner:

i. Where the company who caused the spill has a clean-up company on retainer to deal with these incidents (generally gas stations, trucking companies and others that are more likely to be involved in spills), Gwinnett HazMat will notify the clean-up company of the need for clean-up and provide information as necessary to assist in the clean-up and appropriate response.

ii. Where the company or individual does not have a retainer with a clean-up company and:

1. *The company or individual responsible for the spill is willing to work with the HazMat teams and have the spill cleaned up and are willing to pay for such clean-up.* The Hazmat team will provide a list of clean-up companies the company or individual can choose from. All HazMat trucks have fax machines that can be used by the clean-up company to secure signed paperwork from the company or individual responsible for the spill stating that they accept responsibility for the costs associated with the clean-up. Once the signed statement is received, that clean-up company will commence its response and clean-up.

2. *Or the company or individual responsible for the spill is not willing to work with the HazMat teams and have the spill cleaned up.* The HazMat teams will notify EPD emergency response of the situation and ask for assistance in encouraging the company or individual to clean up the spill. EPD emergency response is notified at any time any hazardous materials enter any drainage structure or water.

- b. Sanitary Sewer Overflow Spill Prevention & Response: The City of Buford operates the sanitary sewer system within the City's service delivery area. Records of all spills are maintained by the City. Procedures for sanitary sewer spill containment are outlined within the Sewer System Maintenance Program which is included in Appendix F.
2. Measurable Goal(s):
 - a. Respond to reported spills and address each expeditiously to avoid stormwater contamination.
3. Documentation to be submitted with each Annual Report:
 - a. Provide documentation on spill occurrences during the reporting period.

5. Public Reporting Procedures

1. Description of SWMP Component:

- a. Citizens who wish to report illicit discharges may do so by calling City Hall at (770) 945-6761 during business hours and (770) 932-7986 after hours. Customer Service is responsible for receiving citizen complaint calls, and reporting them to the appropriate department responsible for taking action to address calls. Citizens may also utilize the Citizen Service Request link on the City's website (<https://www.cityofbuford.com/CitizenServiceRequest.aspx>). The Citizen Service Request tool allows City residents to report non-emergency complaints or concerns regarding code enforcement, sanitation, stormwater, or street issues. All submitted requests are received, reviewed, and acted on by City staff. Appendix F contains screenshots of the form and a screenshot of a monthly database summary. Actions taken by the various departments may include visual inspections, field screening, or contacting another agency to investigate. Customer Service will maintain a log of citizen's complaints.

2. Measureable Goal(s):

- a. The City will verify that the Citizen Service Request link is present on the City's website, as well as verify it is operational.
- b. The City will take action on all reported incidents regarding potential incidents of illicit discharge.

3. Documentation to be submitted with each Annual Report:

- a. Provide documentation on each complaint related to IDDE that was received and investigated during the reporting period, including the status of each complaint.

6. Proper Management and Disposal of Used Oil and Toxic Materials

1. Description of SWMP Component:

- a. Gwinnett Clean & Beautiful (GCB) maintains a website (<http://www.gwinnettcb.org/>) that contains a listing of local sites that will accept waste oil, other toxics and recyclables from the general public. The website also provides information on source reduction, recycling, and proper handling procedures for these materials. Citizens can also visit Gwinnett's CES website (<https://www.gwinnettcountry.com/portal/gwinnett/Departments/CommunityServices/ExtensionServiceWebsite>) and use the hazardous material public information contained therein. The City also maintains a list of local sites that accept waste oil within the City at City Hall and provides the information to interested citizens upon request. A copy of the current list can be found in Appendix F.
- b. The Clean Water Campaign (CWC) has developed a brochure on the management of household hazardous materials, which is available to the public at City Hall and has been included via a link on the City's stormwater webpage. A copy of the brochure can be found in Appendix F.
- c. The City includes bill stuffers in the monthly utility bills at least once per quarter. One of the stuffers used during the year includes information related to Household Hazardous Waste. A sample of the bill stuffers can be found in Appendix L.

2. Measureable Goal(s):

- a. The City will maintain a current list of local sites that accept waste oil and will make this list available within City Hall as needed.
- b. The City will verify that the links on the City's website regarding hazardous household materials are present and are operational.
- c. The City will provide billing stuffers at least once per year regarding household materials.

3. Documentation to be submitted with each Annual Report:

- a. Provide an updated list of the local sites accepting waste oil within the City.
- b. Provide a copy of the bill stuffer used during the reporting period.

7. Sanitary Sewer Infiltration Controls

1. Description of SWMP Component:

- a. The City of Buford maintains and operates the sanitary sewer system within the City. The City's Sanitary Sewer Procedures describing the routine preventative operations and maintenance measures to prevent overflows or discharges from the sanitary sewer to the MS4 are included in Appendix F. The City may conduct random visual inspections of the sanitary sewer via a camera or dye testing. The inspections are most often conducted in response to complaints of sewer backups, presence of known problems, or the presence of animals in sewers. Inspections consist of either first-hand visual or televised inspections (CCTV). When the dry weather screening program returns results that could indicate infiltration of sewage into the MS4, the City will investigate the matter in accordance with procedures described in the IDDE Plan in Appendix I of the SWMP. The public is encouraged to report confirmed or suspected sewage spills from the sanitary sewer system to (770) 945-6761 during business hours and (770) 932-7986 after hours.
- b. The City maintains a link on the Stormwater Management portion of the City's website to a brochure developed by the Clean Water Campaign entitled, "Septic Tank Maintenance." This brochure contains information on proper maintenance of septic tanks, including a recommended schedule for inspections and pumping. The City of Buford has also made this brochure available at City Hall.
- c. The Gwinnett County Health Department inspects septic systems in the City of Buford during construction of the system to ensure proper design and installation. Gwinnett County Health Department will also inspect existing septic systems if there are any indications of failure including complaints of odor, high fecal coliform levels detected during dry weather screening or other sampling, etc. If the Health Department discovers a malfunctioning septic system, the owner will be required to have the system pumped and otherwise maintained as necessary.

2. Measureable Goal(s):

- a. Perform at least one activity to detect and eliminate seepage and spillage from municipal sanitary sewers to the stormwater system during each reporting period.

3. Documentation to be submitted with each Annual Report:

- a. Provide details on any activities or inspections performed during the reporting period to detect and eliminate seepage and spillage.

Industrial Facility Stormwater Discharge Control
Table 3.3.3 of the Permit

1. Industrial Facility Inventory

1. Description of SWMP Component:

- a. The City of Buford currently maintains an industrial facility inventory list which is included in Appendix H. This list is based on the current industrial Notice of Intent (NOI), Industrial Storm Water General Permit (IGP), and No Exposure Exclusion (NEE) listings maintained by EPD, Buford's Industrial Pretreatment Program, and the City's Occupational Tax Certificates using the Standard Industrial Classification (SIC) codes. The inventory will contain the following information: name of facility, street address, SIC codes (where appropriate), and hazardous materials (where known). The City will continue to modify and update this list on an annual basis in accordance with the information sources listed above.
- b. The City has submitted an NOI for coverage under the NPDES General Industrial Stormwater Permit and created a Stormwater Pollution Prevention Plan (SWP3) for the Southside Water Pollution Control Plant (WPCP) and the Public Works Facility. The SWP3s include programs to address spill prevention and response, employee training, water quality monitoring, site inspections, and good housekeeping specific to each municipal site.

2. Measurable Goal(s):

- a. Maintain an updated inventory list of industrial facilities within the City limits.

3. Documentation to be submitted with each Annual Report:

- a. Provide an updated Industrial Facility Inventory with each Annual Report.

2. Inspection Program

1. Description of SWMP Component:

- a. The City of Buford will be responsible for conducting stormwater inspections onsite at industries on the industrial inventory list. A standardized Industrial Site Stormwater Inspection checklist, included in Appendix B, will be used for inspections. (The City uses the Inspections Checklist in both hard copy and electronic format through their Hiperweb software. The City is working to conduct all of the stormwater inspections through Hiperweb moving forward.) The City will maintain records for completed inspections, problems found, and actions taken. City of Buford staff will check to ensure that an NOI has been submitted (if it is required) and will review and check the implementation status of the associated SWP3. The City shall conduct inspections on approximately 20% of the inventoried facilities within the City such that 100% of the facilities are inspected at least once within the 5-year permit period.
- b. The City of Buford's Industrial Inspection Program also includes the inspection of outfalls, including any run-off that may be present from industrial facilities, waste facilities, and hazardous waste treatment, storage and disposal facilities. The outfall inspections and screenings are conducted as described in the IDDE Plan in Appendix I of the SWMP.

2. Measurable Goal(s):

- a. Conduct Industrial Facility inspections such that approximately 20% of the inventoried facilities within the City such that 100% of the facilities are inspected at least once within the 5-year permit period. The City will inspect a minimum of 5% of the facilities inventoried each reporting period.
- b. Conduct a screening of stormwater discharges from the site. Implement source tracing as identified in the IDDE in the event that stormwater runoff is determined to contain pollutant loading.

3. Documentation to be submitted with each Annual Report:

- a. Provide completed inspection forms for each industrial facility inspected during each reporting period.
- b. Provide completed inspection forms for each DWS during each reporting period.
- c. Provide documentation of any illicit discharges and tracing activities used to identify the source(s) during the reporting period.

3. Enforcement Procedures

1. Description of the SWMP Component:

- a. If an illicit discharge is detected during an industrial inspection, or due to a filed complaint, the City will act in accordance with the IDDE Plan (Appendix I) and/or the Enforcement Response Plan (Appendix I). City staff will notify the industry, provide them with a copy of the inspection checklist, possibly issue a Notice of Violation, and perform a re-inspection to ensure that necessary corrections were made. City staff will also notify GA EPD if assistance is needed for enforcement, if there is a threat to Waters of the State, or if a regulated facility has not submitted an NOI. If the violations are not corrected within a timely fashion as dictated by the City, additional enforcement procedures include the City taking action to abate the violations and restoring the property or the issuance of civil or criminal penalties. Enforcement procedures are also noted within the Enforcement Response Plan (ERP), included in Appendix I.

2. Measureable Goal(s):

- a. Implement enforcement procedures in accordance with the IDDE Plan and ERP as required due to polluted stormwater runoff from industrial sites.

3. Documentation to be submitted with each Annual Report:

- a. Provide documentation on any eliminated discharges or enforcement actions taken for illicit discharges during the reporting period.

4. Educational Activities

1. Description of the SWMP Component:

- a. The City will strive to educate the industrial facility owners by providing educational materials during site inspections/visits as well as maintaining availability of various CWC brochures at City Hall and information on the City's website. The materials provided to the owners during inspection will be specific to activities onsite, or general good housekeeping and pollution prevention.

2. Measureable Goal(s):

- a. Provide details of educational activities performed during the reporting period in each Annual Report.

3. Documentation to be submitted with each Annual Report:

- a. Provide a listing of brochures available at City facilities and on the City's website.

Construction Site Management
Table 3.3.4 of the Permit

1. Legal Authority

1. Description of the SWMP Component:

- a. The City of Buford is currently a Local Issuing Authority for LDA Permits as defined by the Georgia Erosion and Sedimentation Act (GESA). The model Soil E&S Ordinance, as written and distributed by EPD, was adopted by the City of Buford on April 1, 2004, and it was last updated on December 4, 2017. Accordingly, the City administers the programs described below in accordance with the responsibilities related to being a Local Issuing Authority. EPD has taken the position that any program in compliance with the regulations of GESA will also be considered in compliance with those requirements of the NPDES MS4 program that relate to E&S. A copy of the current Soil E&S Control Ordinance can be found in Appendix E.
- b. The Ordinance provisions focus on Erosion and Sedimentation (E&S) requirements for issuance of LDA permits; requires best management practices (BMP) to prevent and minimize E&S; require erosion, sedimentation and pollution control plan submission and review prior to commencing construction, conduct inspections and enforcement, including stop work orders, bond forfeiture, and monetary penalties; and require education and certification for persons involved in land development, design, review permitting, construction and other land disturbing activities.

2. Measureable Goal(s):

- a. The City will submit a revised copy of the Soil Erosion, Sedimentation, and Pollution Control Ordinance with the Annual Report should revisions be required and approved by City Commission during the reporting period.

3. Documentation to be submitted with each Annual Report:

- a. Provide a copy of the Soil Erosion, Sedimentation, and Pollution Control Ordinance should the Ordinance be updated during the reporting period.

2. Site Plan Review Procedures

1. Description of the SWMP Component:

- a. Prior to issuance of a LDA Permit (Clearing and Grubbing, Grading, and/or Development), the City requires the submittal of Erosion, Sedimentation and Pollution Control Plans (ESPCP). Submitted plans are reviewed by the City of Buford's Planning and Zoning Department with the inclusion of at least one Georgia Licensed Professional Engineer who possesses a Level II Certification from the Georgia Soil and Water Conservation Commission (GSWCC), as per the Memorandum of Agreement with the GSWCC. The ESPCP must include a set of drawings showing the three phases of the erosion control plan along with the applicable ESPCP Checklist, and will include a hydrology study, if applicable. A copy of the ESPCP checklist and a list of required documents for submittal can be found in Appendix G. The City strives for a turnaround of 30 days per submittal, which may include meeting with developers to satisfy any inquiries. Applicants are also responsible for getting approval from other appropriate jurisdictions (Gwinnett County, GA DOT, etc.) and for providing proof of such approval to the City. The City has a logging system to track permits and monitor review deadlines, as well as providing information for the MS4 Annual Report

2. Measureable Goal(s):

- a. Ensure that 100% of the erosion control plans are reviewed and approved in accordance with the procedures noted above.

3. Documentation to be submitted with each Annual Report:

- a. Provide a list of the site plans received and the number of plans reviewed, approved, or denied during the reporting period.
- b. Provide the number of Land Disturbance Activity (LDA) Permits issued during the reporting period.

3. Inspection Program

1. Description of the SWMP Component:

- a. The City of Buford is responsible for the inspection program that targets construction projects within the city limits. The inspections seek to ensure that structural and non-structural BMPs at construction sites are properly designed and maintained as specified in the Construction General Permits (CGPs). A copy of the inspection forms used by City Staff to inspect BMPs and construction sites can be found in Appendix B. The City uses the inspection forms in both hard copy and electronic format through their Hiperweb software. The City is working to conduct all of their inspections through Hiperweb moving forward.
- b. The City conducts a comprehensive site inspection after land disturbing activities commence and following installation of initial BMPs. Sites will then be inspected on a weekly basis and after final stabilization, in which excess material removal will be verified. Subsequent inspections during the construction process will be prioritized based on issues such as evidence of poor housekeeping, history of poor compliance, evidence of absent or malfunctioning controls, or proximity to local waterways. Follow-up inspections by City staff will take place to verify that corrective measures have been taken for previously documented deficiencies.

2. Measureable Goal(s):

- a. Conduct site inspections at a minimum following installation of initial BMPs, during active construction, and after final site stabilization. Priority will be given to sites showing evidence of malfunctioning control devices, poor housekeeping, history of non-compliance and proximity to local waterways. A minimum of one site inspection per active construction site will be conducted per reporting period.
- b. Complete the inspection forms in either hard copy form or through Hiperweb to document each site visit.

3. Documentation to be submitted with each Annual Report:

- a. Provide the number of active sites during the reporting period.
- b. Provide the number of inspections completed during the reporting period.
- c. Provide copies of the inspection forms completed during the reporting period.

4. Enforcement Procedures

1. Description of the SWMP Component:

- a. The City of Buford has procedures in place to enforce requirements of the E&S Ordinance due to construction site violations. The procedures are described in the E&S Ordinance as well as in the ERP. Upon discovery of a violation, the City will inform the owner/developer of the violation through issuance of a Notice of Violation (NOV), a Stop Work Order (SWO) or other established form of communication. If necessary, the City will take corrective actions to abate the violation. Those actions can be immediate depending on the severity of the violation. The City shall be reimbursed for any work performed on the site. Non-compliance with the City's orders or failure to reimburse the City for the work performed could carry civil and criminal penalties. A copy of the ERP can be found in Appendix I. A copy of the E&S Ordinance can be found in Appendix E.

2. Measureable Goal(s):

- a. Implement and document enforcement procedures for 100% of the E&S violations observed at construction sites.

3. Documentation to be submitted with each Annual Report:

- a. Provide documentation on any enforcement actions taken by the City during the reporting period, including the total number and types of violations.

5. Certification

1. Description of the SWMP Component:

- a. The City requires builders, developers, contractors and others involved in construction activities to hold current applicable GSWCC certification. Upon request by City representatives, personnel directly performing activities on site must be able to produce proof of non-expired certification. Non-compliance with the City's request should be deemed a violation. The City strives to educate all personnel involved in construction activities, in accordance with the rules adopted by GSWCC, on an as needed basis.
- b. The City requires applicable staff to obtain and maintain a Level IB GSWCC certification to be allowed to inspect active construction sites.

2. Measureable Goal(s):

- a. Maintain coverage of Level IB certification through GSWCC for all applicable City personnel involved in construction site inspection.

3. Documentation to be submitted with each Annual Report:

- a. Provide documentation of all certified City personnel during the reporting period.
- b. Provide documentation of all training obtained by City personnel during the reporting period.

Highly Visible Pollutant Sources (HVPS)
Table 3.3.5 of the Permit

1. HVPS Facility Inventory

1. Description of the SWMP Component:

a. The City of Buford maintains an inventory of commercial businesses and facilities that are considered to be Highly Visible Sources of Pollutants (HVPS). A copy of the HVPS Inventory is included in Appendix H. The types of businesses included in the inventory are as follows:

- i. Gas Stations
- ii. Lawn and Garden Services
- iii. Retail Nurseries, Lawn, and Garden Supply Stores
- iv. Commercial Car Washing and Detailing
- v. Retail Automotive Supply Stores

2. Measureable Goal(s):

a. Maintain an updated inventory listing of HVPS facilities within the City of Buford.

3. Documentation to be submitted with each Annual Report:

a. The City will provide an updated inventory of HVPS facilities in each reporting period.

2. Inspection Program

1. Description of the SWMP Component:

- a. The City of Buford is responsible for conducting stormwater inspections onsite at HVPS facilities within the City's jurisdiction. A copy of the form used to inspect the HVPS facilities (Stormwater Inspection Checklist Form) is included in Appendix B. The City uses the inspection form in both hard copy and electronic format through their Hiperweb software as they are working to conduct all of the stormwater inspections through Hiperweb moving forward. The City will conduct inspections on 100% of the inventoried HVPS facilities during the 5-year period, with approximately 20% of the facilities inspected each year. Per the Permit, a minimum of 5% of the facilities will be inspected in any given year. Priority of inspection will be based on the following criteria:
 - i. Complaints or history of bad housekeeping or illicit discharge to the MS4.
 - ii. Hazardous nature of HVPS.
 - iii. Proximity to environmentally sensitive areas.

2. Measureable Goal(s):

- a. Inspect approximately 20% of the HVPS facilities per reporting period such that 100% are inspected in the 5-year permit term. No less than 5% of the facilities shall be inspected in any given year per the Permit requirements.

3. Documentation to be submitted with each Annual Report:

- a. Provide the total number of HVPS facilities and number and percentage of inspections completed during the reporting period.
- b. Provide documentation of all HVPS facilities inspected during the reporting period.

3. Enforcement Procedures

1. Description of the SWMP Component:

- a. If it is determined during an inspection of a HVPS facility that a violation is occurring or has the potential to occur, the City will take action in accordance with the IDDE Plan and the Enforcement Response Plan (ERP). Initial measures include notification of the commercial business owner, issuance of a NOV or similar as well as an appropriate timeframe for compliance. Once corrections are made, or the timeframe for compliance had expired, the City will conduct a follow-up inspection. Continued violations that are not addressed will be handled in compliance with the provisions noted in the ERP. Copies of the IDDE Plan and ERP can be found in Appendix I.

2. Measureable Goal(s):

- a. Document any enforcement procedures that are enacted towards a HVPS facility due to violations or deficiencies noted during inspections.
- b. Enforce violations as noted in the IDDE Plan and ERP.

3. Documentation to be submitted with each Annual Report:

- a. Provide documentation on any enforcement actions taken at HVPS facilities during the reporting period.

4. Educational Activities

1. Description of the SWMP Component:

- a. The City provides the HVPS site owners with available relevant information to educate the owners in ways to reduce the likelihood of stormwater pollution. The City also refers the HVPS owners to the 8-part series entitled “Hands in For Health Streams” which is available on the City’s website. The City maintains several educational links on their website that refer to relevant educational information from Gwinnett County Clean & Beautiful and the Clean Water Campaign. The City encourages business owners and their staff to become acquainted with programs such as the Clean Water Campaign for additional resources.

2. Measureable Goal(s):

- a. Provide HVPS site owners/operators with relevant brochures and pamphlets.
- b. Maintain brochures at City Hall.
- c. Maintain links to applicable resources on the City’s website.

3. Documentation to be submitted with each Annual Report:

- a. Provide a listing of brochures available at City facilities and on the City’s website.

Public Education
Table 3.3.9 of the Permit

1. Public Education - Educational Activity #1

1. Description of the SWMP Component:

- a. Brochures in Public Places: The City maintains various brochures within City Hall. The brochures cover a wide range of topics such as water conservation, septic tank maintenance, landscaping practices, toxic and household waste disposal.

2. Measureable Goal(s):

- a. Brochures: The City will strive to make sure an ample supply of current brochures are available at City Hall. The City will also coordinate with the Clean Water Campaign to stay current on brochure updates and availability.

3. Documentation to be submitted with each Annual Report:

- a. The City will provide a listing of brochures that were available at City Hall during the reporting period.

2. Public Education - Educational Activity #2

1. Description of the SWMP Component:

- a. Municipal Website: The City maintains a website that includes topics related to each department. Information contained on the website related to stormwater includes information on pollution from runoff, septic tank maintenance, and hazardous waste.

2. Measureable Goal(s):

- a. Municipal Website: The City will strive to update the City's website to contain up-to-date information related to stormwater pollution and reduction. The City will also update the website to include a link to the SWMP once approved by EPD.

3. Documentation to be submitted with each Annual Report:

- a. The City will provide a listing of relevant topics and links included on the City's website during the reporting period.

3. Public Education - Educational Activity #3

1. Description of the SWMP Component:

- a. Booth at Community Event: The City takes part in the Gwinnett County Public Safety Fall Festival by setting up a booth containing brochures and information regarding numerous water, wastewater, and stormwater topics. The City is also evaluating additional community events and festivals in the area at which these efforts could be duplicated.

2. Measureable Goal(s):

- a. Participate in at least one local festival per year to display a booth containing stormwater related information and brochures as well as City staff to answer any questions or concerns citizens may have.

3. Documentation to be submitted with each Annual Report:

- a. The City will provide photographic documentation of each community event/festival in which the City participates.

4. Public Education - Educational Activity #4

1. Description of the SWMP Component:

- a. Utility Bill Inserts: The City includes bill stuffers with utility bills at least once per quarter. The stuffer topics cover a range of information including water conservation and stormwater pollution prevention. A sample of the bill stuffers that have been utilized in the past are included in Appendix L.

2. Measureable Goal(s):

- a. Include stormwater prevention related bill stuffers at least once per reporting period.

3. Documentation to be submitted with each Annual Report:

- a. Include a copy of stormwater bill stuffers that were utilized during the reporting period.

Public Involvement
Table 3.3.10 of the Permit

1. Public Involvement - Activity #1

1. Description of the SWMP Component:

a. Municipal Website: The City maintains a website that includes a link on the home page titled “Citizen Service Request” (<https://www.cityofbuford.com/CitizenServiceRequest.aspx>). This tool allows City residents to report non-emergency complaints or concerns regarding code enforcement, sanitation, stormwater, or street issues: All submitted requests are received, reviewed, and acted on by City staff. Appendix F contains screenshots of the form and a screenshot of a monthly database summary. Actions taken by the various departments may include visual inspections, field screening, or contacting another agency to investigate. Screenshots of the online form can be found in Appendix F.

2. Measureable Goal(s):

- a. The City will verify that the Citizen Service Request link is present on the City’s website, as well as verify it is operational.
- b. City will work to investigate each concern received regarding aspects related to the MS4. Repairs will be scheduled as necessary and as required to address the concern. Documentation will be prepared reflecting the response and repairs to each concern received.

3. Documentation to be submitted with each Annual Report:

- a. The City will provide copies of documentation prepared for each concern reported during the reporting period that was deemed relevant to the MS4, including but not limited to, storm drain issues, litter, street repairs, erosion, and illicit discharges.

2. Public Involvement - Activity #2

1. Description of the SWMP Component:

- a. Storm Drain Marking: The City has historically coordinated with a local Girl Scout Troop to periodically conduct storm drain stenciling. The City provides the Troop with stencils and paint to be used. The City plans to coordinate with local scouting organizations in the future to inform them of the City's willingness to work with the scouts for community involvement efforts.

2. Measureable Goal(s):

- a. Develop a list of local scouting organizations and contact information.
- b. Reach out to the scouting organizations on an annual basis to inform them of the City's willingness to have the scouts work with the City on community involvement efforts.

3. Documentation to be submitted with each Annual Report:

- a. Documentation of outreach efforts to scouting organizations.
- b. Photographs from any events that are held with scouts within the City.

3. Public Involvement - Activity #3

1. Description of the SWMP Component:

- a. Pet Waste Stations: The City is currently evaluating locations within the City that would be most feasible for the installation of pet waste stations. Once locations are identified and installation of a limited number is complete, the City will monitor their use to determine if additional stations are feasible in public areas where dogs are allowed.

2. Measureable Goal(s):

- a. Install pet waste stations in areas where determined feasible to help reduce the amount of pollution from stormwater runoff containing pet waste.
- b. Maintain pet waste stations by emptying the containment bins and restocking bagging supplies as needed.

3. Documentation to be submitted with each Annual Report:

- a. Provide a listing of pet waste stations installations within the City.

4. Public Involvement - Activity #4

1. Description of the SWMP Component:

- a. Stream Cleanup: The City plans to coordinate with local scouting organizations in the future to inform them of the City's willingness to work with the scouts for community involvement efforts including stream cleanup events....

2. Measureable Goal(s):

- a. Develop a list of local scouting organizations and contact information.
- b. Reach out to the scouting organizations on an annual basis to inform them of the City's willingness to have the scouts work with the City on community involvement effort.

3. Documentation to be submitted with each Annual Report:

- a. Documentation of outreach efforts to scouting organizations.
- b. Photographs from any events that are held with scouts within the City.

Post-Construction
Section 3.3.11 of the Permit

1. Ordinance Review (Section 3.3.11(a)(1) of the Permit):

- A. Provide the date of the adoption of the Post-Construction ordinance: 2004
- B. Provide the date of the adoption of the Georgia Stormwater Management Manual: 2017
- C. A copy of the Post-Construction ordinance is attached to the SWMP.
- D. Describe the status of implementing the stormwater runoff quality/reduction performance standard (Section 3.3.11(a)(2) of the Permit), including the implementation of Option (a) by the deadline date of December 10, 2020: Site plan reviews are performed by a local consulting engineering firm on behalf of the City. The stormwater runoff water quality/reduction performance standard is assessed based on the guidance outlined in the Georgia Stormwater Management Manual (GSMM), latest edition. If adequate documentation is provided by the applicant and it's determined by the City's consulting engineer that it is infeasible to apply the stormwater runoff quality/reduction standard #3 in the GSMM and Option (a) of Section 3.3.11(a)(2), the City may waive a portion or all of the runoff reduction in accordance with the MS4 permit and the GSMM. Conditions that may not meet the maximum extent practicable standard include, but are not limited to, karst topography, soils with very low infiltration rates, high groundwater, or shallow bedrock.

2. Linear Transportation Project

- A. The linear transportation feasibility program is voluntary. Have you developed or are you planning to develop a linear transportation feasibility program?
Yes ___ No x
- B. If yes, is the linear transportation feasibility program attached to the SWMP?
Yes ___ No ___
- C. If you plan to develop a linear transportation feasibility program, provide the schedule for submitting the program: _____

Green Infrastructure/Low Impact Development (GI/LID)
Table 3.3.11(b)(2) of the Permit

1. Legal Authority

1. Description of the SWMP Component :

- a. The City of Buford performed a review of their Codes and Ordinances by completing the “Code and Ordinance Worksheet” published by the Center for Watershed Protection, in compliance with the GI/LID requirements of a previous NPDES MS4 Permit. The review resulted in various revisions to the City’s Zoning Ordinances which have been completed and adopted by the City. The review was submitted to EPD on September 29, 2011. A copy of the Worksheet can be found in Appendix E.

2. Measureable Goal(s):

- a. Completion of the Code and Ordinance Worksheet to understand how the City of Buford measures in comparison to the model development principles. Its purpose was to assess current development rules, identify impediments to innovative site design and evaluate the City’s ability to support environmentally sensitive development. The City will provide, if applicable, updated existing ordinance(s) that are modified in regards to GI/LID with the Annual Report.

3. Documentation to be submitted with each Annual Report:

- a. Provide, if applicable, updated existing ordinance(s) that are modified in regards to GI/LID with the Annual Report.

2. GI/LID Program

1. Description of the SWMP Component:

- a. The City has developed a GI/LID program describing the GI/LID techniques and practices to be implemented. The program includes the review and approval of GI/LID structures and practices of new developments and is being tracked in conjunction with the site plan review process. All GI/LID practices accepted by the City follow the guidelines as described in the Georgia Stormwater Management Manual, latest edition.

2. Measureable Goal(s):

- a. Completion of a GI/LID Program as required by the Permit.

3. Documentation to be submitted with each Annual Report:

- a. Provide, if applicable, an updated GI/LID program.

3. GI/LID Structure Inventory

1. Description of the SWMP Component:

- a. The City maintains an inventory and map reflecting the locations of the GI/LID structures in electronic format. The database will be updated based on new construction, stormwater infrastructure upgrades, and determinations that existing GI/LID structures may have been overlooked. As of the date of this SWMP, there are no GI/LID structures located in the City. Therefore, a map has not been provided.

Measureable Goal(s):

- a. Provide an updated inventory and map of the City's GI/LID structures.
 - b. Update the inventory and map in each reporting period and summarize the number of structures that were added during each reporting period with the submittal of the Annual Report.
2. Documentation to be submitted with each Annual Report:
- a. Current GI/LID Structure Inventory
 - b. Current GI/LID Structure Map(s)

4. Inspection and Maintenance Program

1. Description of the SWMP Component:

- a. The City will conduct inspections and/or ensure that inspections are conducted on 100% of privately owned non-residential and publicly owned GI/LID structures within the 5-year permit term. For permittees with five or more GI/LID structures included on the inventory, at a minimum, the City will conduct inspection on 5% of the structures each reporting period.

2. Measureable Goal(s):

- a. Inspect on average 20% of the GI/LID structures per year. If a low percentage of inspections is conducted during one reporting period, the City will increase inspection frequency during the 5-year permit term to ensure that 100% of the GI/LID structures are inspected.

3. Documentation to be submitted with each Annual Report:

- a. Notation of the total number and percentage of GI/LID structures inspected during the reporting period.
- b. Notation of the total number of GI/LID structures maintained during the reporting period.
- c. Provide documentation of maintenance activities associated with privately-owned non-residential GI/LID structures.

Appendix (I)

Enforcement Response Plan (ERP)
Section 3.3.6 of the Permit

1. The MS4 was required to develop an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Storm Water Management Program.
 - A. Provide the date the ERP was approved by EPD: _____
 - B. If the ERP has not yet been approved, provide the date submitted to EPD: ERP is being submitted as part of this SWMP, having a submittal date of December 5, 2019.
2. A copy of the ERP is attached to this Appendix.

Appendix (K)

Impaired Waters
Section 3.3.7 of the Permit

1. Population at the time of designation: 15,189 (U.S. Census, Year 2018)
2. The Impaired Waters Plan (see Part 3.3.7 of the NPDES Permit) must, at a minimum, include:
 - 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, 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; and
 - A schedule for implementing the BMPs;*
 - 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.
3. If the population exceeds 10,000, and a water is impaired for fecal coliform bacteria, then the MS4 must also address the following in the Impaired Water Plan:
 - Sample frequency for fecal coliform bacteria to include four geometric means per reporting period (16 samples);
 - A description of the development of a Sampling Quality and Assurance Plan if the fecal coliform data is below water quality standards for two years.

Appendix (L)

Municipal Employee Training
Section 3.3.8 of the Permit

1. Description of the Employee Training Program:
 - a. The City strives to hold training sessions for applicable staff at least one time per year. The training sessions are generally related to various aspects of stormwater topics such as the various inspection procedures, illicit discharge detection and elimination, and stormwater sampling. Training sessions may involve attendance at an applicable seminar or conference. Other training sessions utilized by the City are often offered online.
2. Measureable Goal(s):
 - a. Provide applicable stormwater-related training to City staff at least one time per year.
 - b. Document each training session.
3. Documentation to be submitted with each Annual Report:
 - a. Provide documentation of each training activity during the reporting period including topics covered, date(s), location of training, website of training program (if applicable), and list of attendees at each event.