Existing Phase II MS4

Storm Water Management Program Template

Please note that this template does not provide an exhaustive listing of what the NPDES Permit requires to be included in the Storm Water Management Program (SWMP). The permittee must carefully review each part of the Permit and ensure all items are included.

General Information for Submitting a SWMP

- Your Storm Water Management Program (SWMP) becomes a part of the NPDES Permit, upon SWMP approval. It must be a complete document containing all the necessary components. Although ordinances, procedures, etc., were submitted with the previous SWMPs, the current SWMP must include the most recent version of these documents. Ensure that you submit all of the necessary components, including copies of the latest versions of the following:
  1) Adopted stormwater ordinances (Illicit Discharge, Erosion and Sedimentation, and Post-Construction);
  2) Standard Operating Procedures (e.g. dry weather screening procedures, construction site inspection procedures, street sweeping procedures);
  3) Blank copies of forms to be used to implement the SWMP, including inspection forms;
  4) Signed Memorandum of Agreements; and
  5) Maps and inventories.

- The NPDES Permit contains a table for each of the minimum control measures (MCMs). For four of the MCMs, the BMPs in the table contain a measurable goal that states what must be submitted with each annual report. Incorporate this information into the BMP's measurable goal in your SWMP. If the Permit does not specify what must be submitted, then the measurable goal for each BMP in your SWMP must still state what documentation will be submitted with the annual report.

- Documentation to be submitted as appendices to the SWMP can be submitted by hard copy or on CD. For example, copies of ordinances or maps can be submitted using either method. If information is submitted on a CD, EPD must be able to open and read all files on the CD (e.g. GIS maps).

STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Storm Water Management Program (SWMP)
General NPDES Permit No. GAG610000 for
Small Municipal Separate Storm Sewer Systems (MS4)

General Information

A. Name of small MS4: Lowndes County Board of Commissioners

B. Name of responsible official: Bill Slaughter
Title: Chairman
Mailing Address: P.O. Box 1349
City: Valdosta State: Georgia Zip Code: 31603-1349
Telephone Number: (229) 671-2400

C. Designated stormwater management program contact:
Name: Michael Fletcher
Title: County Engineer
Mailing Address: P.O. Box 1349
City: Valdosta State: Georgia Zip Code: 31603-1349
Telephone Number: (229) 671- 2421
Email Address: mfletcher@lowndescounty.com

2. Sharing Responsibility

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

Control Measure or BMP:

1. Name of entity_____

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

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

3. Minimum Control Measures* and Appendices

A. Public Education and Outreach
B. Public Involvement/Participation
C. Illicit Discharge Detection and Elimination
D. Construction Site Stormwater Runoff Control
E. Post-Construction Stormwater Management in New Development and Redevelopment
F. Pollution Prevention/Good Housekeeping
G. Appendix A – Enforcement Response Plan
H. Appendix B – Impaired Waters
I. **Attachments** – A1-A7/B1/C1-C8/D1-D10/E1-E7/F1-F7

4. Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: Bill Slaughter Date: _____

Signature: _____ Title: County Chairman

Lowndes County
Storm Water Management Program

MCM-A
Public Education and Outreach on Storm Water Impacts

40 CFR Part 122.34(b)(1) Requirement: The permittee must implement a public education program to distribute educational materials to the community and/or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff. **See Table 4.2.1(a) of the Permit**

A. Best Management Practice (BMP) #1: Public Education Program

1. Target audience: Homeowners, students, contractors and general public.

2. Description of BMP: **Lowndes County (LC) maintains a website to educate homeowners, businesses, schools and the general public about the impacts that stormwater runoff has on local water bodies at www.lowndescounty.com (To view, select Engineering; then NPDES Information). The information will be promoted through various educational and promotional materials.**

3. Measurable goal(s): **LC website will be updated a minimum of one time per year.**

4. Documentation to be submitted with each annual report: **The County will provide a summary of the stormwater related webpages and the dates that they were updated in each annual report.**

5. Schedule:
   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): **January 2013**
   c. Frequency of actions (if applicable): **Once a year**
   d. Month/Year of each action (if applicable): **Annually**
6. Person (position) responsible for overall management and implementation of the BMP: **Stormwater Technician**

7. Rationale for choosing BMP and setting measurable goal(s): **A variety of stormwater subjects can be posted regularly on the webpage.**

8. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **Although it is difficult to precisely measure the effect that educational materials via website has, there is little disagreement about the effect that awareness has on human attitude and behavior**

B. BMP #2 Classroom Education

1. Target audience: School children (K-12) and teachers.

2. Description of BMP: **The County will provide a Stormwater pollution prevention presentation to elementary schools using an EnviroScape Watershed / Non –Point Source 3D-Model as the principle teaching tool. The presentation describes actions that students and residents can take to prevent and reduce stormwater pollution in the community**

3. Measurable goal(s): **LC will perform a minimum of two presentations each year and document the information provided and the number of attendees.**

4. Documentation to be submitted with each annual report: **The County will provide a summary of each event, including the dates, the number of attendees and information provided in each annual report.**

5. Schedule:
   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): **January 2013**
   c. Frequency of actions (if applicable): **Once a year**
   d. Month/Year of each action (if applicable): **Annually**

6. Person (position) responsible for overall management and implementation of the BMP: **Stormwater Technician**

7. Rationale for choosing BMP and setting measurable goal(s): **Classroom presentations provide educational opportunities to the students and teachers, while also developing partnerships.**

8. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **The benefits of providing children and adults with information that they can relate to and understand can be difficult to measure, but it is an effective way to instill environmental awareness and change habits for all ages.**

MCM-B
Public Involvement/Participation

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

See Table 4.2.2 (a) of the Permit

A. Best Management Practice (BMP) #1: Storm drain stenciling

1. Target audience/stakeholder group: **Residential property owners.**

2. Description of BMP: **LC will install storm drain marking *(B1 – Stormwater Marker)* within residential neighborhoods as new / re-development occurs and partner with contractors, citizens, and/or staff. LC staff will replace any damaged or missing storm drain stencils.**

3. Measurable goal(s): **LC will hold a minimum of one storm drain stenciling event and document the number of storm drains marked.**

4. Documentation to be submitted with each annual report**: The County will submit an installation summary of all stenciling events or replacements conducted during the reporting period will be submitted annually.**

5. Schedule:
   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): **2005**
   c. Frequency of actions (if applicable): **Once per year**
   d. Month/Year of each action (if applicable): **Annually**

6. Person (position) responsible for overall management and implementation of the BMP: **Stormwater Technician**

7. Rationale for choosing BMP and setting measurable goal(s): **Placing markers throughout the community will raise public awareness of urban pollution. The storm drain marking program should discourage practices that generate stormwater pollutants**

8. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **By raising public awareness of urban runoff, the storm drain marker program should discourage practices that generates stormwater pollution.**

MCM-B
Public Involvement/Participation

B. BMP #2: River / stream cleanup

1. Target audience/stakeholder group: Community volunteers

2. Description of BMP: **LC in partnership with the Keep Lowndes Valdosta Beautiful (KLVB) program organizes, promotes and participates in the annual Rivers Alive Cleanup at various stream locations.**

3. Measurable goal(s): **LC will participate in an annual river / stream cleanup during each reporting period.**

4. Documentation to be submitted with each annual report**: The County will provide a summary of the event results (e.g. waterways, number of volunteers / organization, and volume of trash collected) and media coverage (if available) in each annual report.**

5. Schedule:
   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): **2005**
   c. Frequency of actions (if applicable): **Once per year**
   d. Month/Year of each action (if applicable **Annually**

6. Person (position) responsible for overall management and implementation of the BMP: **Stormwater Technician**

7. Rationale for choosing BMP and setting measurable goal(s): **Yearly river cleanups can raise public awareness of illegal dumping and urban runoff and can discourage practices that generate non – point source pollution by citizens.**

8. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **Annual stream cleanups are hands – on opportunities that are effective at increasing public awareness of pollution sources and will help remove trash and debris out of the streams.**

MCM-C
Illicit Discharge Detection and Elimination

40 CFR Part 122.34(b)(3) Requirement: The permittee 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-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions;

C) Develop and implement a plan to detect and address non-storm water 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.

See Table 4.2.3 (a) of the Permit

A. BMP #1: Outfall Map and Inventory

1. Description of BMP: **The County has a completed storm sewer system inventory and outfall map showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls**. *(See Attachment: C1 – Outfall Inventory)* **and storm sewer map** *(see Attachment: C2 – Outfall Map)* **as an addendum to this form. The County will update its permitted urban area (UA) map and inventory to include the 2010 census results.**

2. Measurable goal(s): **The County will update the outfall inventory and its outfall map annually showing any outfalls added during the reporting period.**

3. Documentation to be submitted with each annual report: **The County will provide a summary of the total number of outfalls, including a list of the outfalls added during the reporting period, and an updated map in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): **2010**
   b. Implementation dates (if applicable): **2006**

c. Frequency of actions (if applicable): **Annually**
d. Month/Year of each action (if applicable): **January**

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

6. Rationale for choosing BMP and setting measurable goal(s): **It is important to continuously maintain the stormwater system information to identify problems and ensure proper functions.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **By having accurate information, the County's IDDE program can respond quickly and take the necessary steps to ensure a successful program.**

B. **BMP #2: Legal Authority**

1. Description of BMP: **The County will prohibit through ordinance, or other regulatory mechanisms, non – stormwater discharges into the MS4 and implement appropriate enforcement procedures and actions. The County adopted the Illicit Discharge and Illegal Connections Ordinance on May 9, 2006**. (*See Attachment: C3– Illicit Discharge and Illegal Connections Ordinance).*

2. Measurable goal(s): **The County will evaluate the existing illicit discharge ordinance, and if necessary, modify the ordinance during the reporting period.**

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

4. Schedule:
a. Interim milestone dates (if applicable): **N/A**
b. Implementation dates (if applicable): **2006 – Adopted**
c. Frequency of actions (if applicable): **Revise as needed**
d. Month/Year of each action (if applicable): **N/A**

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

6. Rationale for choosing BMP and setting measurable goal(s): **An illicit discharge ordinance protects the public health, safety, environment and general welfare by controlling the introduction of pollutants into**

the stormwater system and provides enforcement procedures and actions.

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **Through regular inspections illicit discharges will be identified and addressed.**

C. BMP #3: Illicit Discharge Detection and Elimination (IDDE) Plan

1. Description of BMP: **The County will conduct dry weather screening inspections so that 100% of the outfalls are inspected within the 5 – year permit term. Staff will follow the *Dry Weather Screening Procedure (DWS) manual*** (See Attachment: C4 – DWS Procedure manual) **and record each inspection on the DW *Screening Outfall form*** (See Attachment: C5-DW Screening Outfall form)**. If samples of the water discharging from the outfall are outside the suggested ranges in Table 1, County staff will initiate source tracing and enforcement activity. For more details, please** (*see attachment: C6 - IDDE SOP manual)* **which includes inspections, detection, sampling, source tracing, elimination, and education. Enforcement actions are also identified and enforceable as part of the county's ULDC.**

TABLE 1

WATER QUALITY TEST	COMMENTS / SUGGESTED RANGES
Conductivity	Measured in the field with a probe / Less than 300 micromhos (µmho/cm). If greater than 300 mho/cm, take grab sample and provide to POTW laboratory for fecal coliform testing
Surfactants	Measured with detergent test / Less than 0.2 mg/l. If found to be significantly high, send sample to contract laboratory
pH	Measured in the field and laboratory with a probe / pH is 6-9 standard units (su)
Temperature	Measured in the field with a probe / Temperature should be near or below ambient conditions for groundwater or stormwater runoff
Fluoride	Measured in the field with a meter / Less than 0.2 mg/L

*In addition to these parameters, the following field observations are conducted: Flow, Odor, Color, Turbidity and Floatables

2. Measurable goal(s): **The County will conduct dry weather screening inspections on 20% of the outfalls during the reporting period. If an illicit discharge is found, the County will document any illicit discharge detection activities performed and enforcement actions taken to eliminate illicit discharges.**

3. Documentation to be submitted with each annual report: **The County will provide the number of outfall inspections conducted and hard copies of 10% of the inspection forms. If an illicit discharge is found, any**

activities performed will be provided, including eliminated discharges and/or enforcement actions in each annual report.

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation dates (if applicable): **2010 – IDDE Manual**
      2013 – Develop Procedures
   c. Frequency of actions (if applicable): **Continuous**
   d. Month/Year of each action (if applicable): **Annually**

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

6. Rationale for choosing BMP and setting measurable goal(s): **The detection and elimination of illicit discharges is important to protect and restore urban waterways.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **By routinely inspecting outfalls this will help to ensure the stormwater system is operating properly, while also identifying and eliminating illicit discharges**.

D. BMP #4: Education

1. Description of BMP: **Lowndes County will disseminate public education to employees, businesses, and the general public about the hazards associated with illicit discharges and improper disposal of waste through various media resources (e.g. newspaper articles, brochures, and/or television ads). Educational information is also available at the LC website for residential, commercial, construction, and illicit discharge.**

2. Measurable goal(s): **LC will provide a minimum of two educational information messages on illicit discharges and provide documentation.**

3. Documentation to be submitted with each annual report: **The County will provide a summary that includes the date, type of educational information, and method of how it was distributed in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): **2005**
   c. Frequency of actions (if applicable): **Twice a year**
   d. Month/Year of each action (if applicable **annually**

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

6. Rationale for choosing BMP and setting measurable goal(s): **Educating the community about the negative impact of illicit discharges can help identify and prevent problems that may occur.**

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **Although it is difficult to precisely measure the effect that educational material has, it is the general consensus that public awareness can change citizen's attitudes and behavior, thereby, indirectly enlisting community efforts in reducing illicit discharge/connections.**

BMP #5: **Illicit Discharge Complaint Response**

1. Description of BMP: **The County has a procedure in place to respond to illicit discharge complaints received. When an illicit discharge is detected, either through concerned citizen reports or departmental monitoring, source tracking methods are used such as observation and backtracking the discharge so that it can be eliminated. (See attachment: C6-IDDE SOP manual).**

2. Measurable goal(s): **LC will document all IDDE complaints received during each reporting period.**

3. Documentation to be submitted with each annual report: **The County will provide a summary of complaints received that includes the complaint date, type of complaint, and complaint status in each annual report. (See attachment: C8-Illicit Discharge Tracking form).**

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): **2012**
   c. Frequency of actions (if applicable): **As needed**
   d. Month/Year of each action (if applicable): **Annually**

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

6. Rationale for choosing BMP and setting measurable goal(s): **Public receipt of complaints is an important component of an effective IDDE program that insures the tracing and elimination of Illicit discharges and connections.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **By documenting all IDDE complaints responses with a tracking report will show the number of incidences, the status and resolution of every complaint that's brought to the county's attention as it pertains to illicit discharge/connections**.

MCM-D
Construction Site Storm Water Runoff Control

40 CFR Part 122.34(b)(4) Requirement: The permittee must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Storm water discharges from construction activity disturbing less than one acre must be included in the permittee's program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The 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.

See Table 4.2.4 (a) of the Permit

A. Best Management Practice (BMP) #1: Legal Authority

1. Description of BMP: **The County will ensure that the E&S (and/or the Anti-Litter) ordinances requires construction site operators to control waste at the construction site, such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste. The County currently addresses construction waste in the litter ordinance (adopted 07/14/09).** (See Attachment: D1-Soil E&S Pollution Control Ordinance and D2 – Anti-Litter Ordinance).

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2. Measurable goal(s): **The County will evaluate the existing E&S ordinance, and if necessary, modify the ordinance during the reporting period.**

3. Documentation to be submitted with each annual report**: If the E&S ordinance is revised during the reporting period, the County will provide a copy of the adopted ordinance in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**

   b. Implementation dates (if applicable): **E&S Ord (Adopted: 2006) Revised: 12/13/2016 Litter Ord (Adopted: 2009) Revised: 12/9/2014**

   c. Frequency of actions (if applicable): **As Needed**

   d. Month/Year of each action (if applicable): **January**

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

6. Rationale for choosing BMP and setting measurable goal(s): **The E&S ordinance provides regulations that reduces construction activity pollutants and materials from entering waters of the State.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **Through enforcement of land disturbance activities permit, construction sites will be required to handle and dispose of waste materials properly.**

B. BMP #2: Site Plan Review Procedures

1. Description of BMP: **LC staff will review one-hundred percent (100%) of all design plan submittals received for Land Disturbance Activity (LDA) Permits** *(See Attachments: D3-Construction Project Plan Review Procedure)* for **all site disturbance of 1.0 acres and larger. No LDA Permits will be issued without an approved Erosion and Sediment Control Plan. Our checklist** *(see Attachment: D4–E&S Plan Review Checklist)* **is developed from our E&S Ordinance which was developed based upon the state model E&S Ordinance, therefore addresses concerns of potential water quality impacts.**

2. Measurable goal(s): **LC will review and document all site plans submitted for an LDA permit during each reporting period.**

3. Documentation to be submitted with each annual report**: The County will provide a list of site plans received and the number of site plans reviewed, approved, or denied in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): 2005
   c. Frequency of actions (if applicable): Continuous
   d. Month/Year of each action (if applicable): Annually

3. Person (position) responsible for overall management and implementation of the BMP: **County Engineer**

6. Rationale for choosing BMP and setting measurable goal(s): **The County is performing this effort as a part of its responsibility as an Local Issuing Authority.**

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **By requiring the plan review of 1.0 acres or more, it allows the County to ensure construction projects meets proper design guidelines.**

BMP #3: Site Inspection Program

1. Description of BMP: **LC staff will make at least two site visits (e.g. during construction and final construction / site stabilization) to inspect the conditions of the site and to verify compliance with the approved E&S control plan.** See attachments: D5-Construction Site Inspection Procedure and D6-LDA Site Inspection Checklist.

2. Measurable goal(s): **LC will inspect all construction site at least two times from the start of initial activity stage to the final stabilization of the project.**

3. Documentation to be submitted with each annual report: **The County will provide a list of active construction sites and copies any inspections conducted during the reporting period in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): 2005
   c. Frequency of actions (if applicable): Continuous
   d. Month/Year of each action (if applicable): Annually

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

6. Rationale for choosing BMP and setting measurable goal(s): **By performing site inspections will ensure compliance and enforcement of bmp control measures.**

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **By documenting all site inspections verifies that every construction sites has been monitored throughout the building process for compliance to approved plans, therefore, having a positive impact in reducing pollution.**

BMP #4: Enforcement Procedures

1. Description of BMP: **LC maintains ordinances that provide legal enforcement authority to address E&S violations.** (See Attachment: D1-Soil E&S Pollution Control Ordinance and D2 – Anti-Litter Ordinance). **If a violation of the County ordinance is found, the appropriate enforcement actions are will be taken, which may include verbal warning, written warning, stop work order, etc. All violations will be investigated and the resolution will be recorded.** (See Attachment: D7-Construction Site Enforcement Procedures).

2. Measurable goal(s): **LC will respond and document all construction projects violations during each reporting period.**

3. Documentation to be submitted with each annual report: **The County will provide a summary of all E&S violations, any enforcement actions taken, including the number and type (e.g. Notice of Violation, Stop Work Order) and status (e.g. pending, resolved) in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): 2005
   c. Frequency of actions (if applicable): Continuous
   d. Month/Year of each action (if applicable): Annually

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

6. Rationale for choosing BMP and setting measurable goal(s): **The County is performing this effort as a part of its responsibility as a Local Issuing Authority.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **When construction violations are corrected, then the enforcement measures are effective.**

BMP #5: Complaint Response

1. Description of BMP: **There will be two primary methods for receipt of information submitted by the public: by telephone and by e-mail. The appropriate county contact telephone number will be included in handouts, brochures, newspaper ads and County telephone listings for land disturbance and stormwater runoff quality concerns. The County's website has a link where information may be submitted. County responses to the information received will be performed by appropriate county staff. Records of the submittal of information from the public will be logged**. *(See attachment: D8–Construction Complaint SOP manual and D9-Construction Site Complaint form)*.

2. Measurable goal(s): **LC will document, investigate, and provide a resolution for all construction public complaints.**

3. Documentation to be submitted with each annual report: **The County will provide a summary of the E&S complaints received (e.g. complaint date, type of complaint, complaint status) in each reporting period.**

4. Schedule:
   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): 2005
   c. Frequency of actions (if applicable): Continuous
   d. Month/Year of each action (if applicable): Annually

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

6. Rationale for choosing BMP and setting measurable goal(s): **Execution of these procedures will ensure County compliance with regulations requirements for receipt and consideration of information submitted by the public.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit**:** **Documenting the number of construction complaints (or the lack of complaints) will show the construction community's adherence to the County's ordinance. This bmp allows the public to assist in the County's pollution reduction efforts.**

BMP #6: Staff Inspector's GSWCC Certification

1. Description of BMP: **LC will ensure that all staff personnel involved in inspection of construction activities subject to the Construction General Permit (CGP) are trained and certified in accordance with the Georgia Soil and Water Conservation Commission (GSWCC).**

2. Measurable goal(s): **LC will provide the number and type of current certifications held by MS4 inspector in each annual report.**

3. Documentation to be submitted with each annual report: **The County will provide the number and type of current certifications held by MS4 staff in each annual report.**

4. Schedule:

   a. Interim milestone dates (if applicable): N/A
   b. Implementation date (if applicable): 2005
   c. Frequency of actions (if applicable): Annually
   d. Month/Year of each action (if applicable): N/A

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

6. Rationale for choosing BMP and setting measurable goal(s): **The County is performing this effort as a part of its responsibility as a Local Issuing Authority.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **Certified inspectors are able to identify construction site problems for compliance.**

MCM-E
Post-Construction Storm Water Management in New Development and Redevelopment

40 CFR Part 122.34(b)(5) Requirement: The permittee must develop, implement, and enforce a program to address storm water runoff into the MS4 from new development and redevelopment projects, including projects less than one acre if they are part of a larger common plan of development or sale. 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.

See Table 4.2.5 (a) of the Permit

A. BMP #1: Legal Authority

1. Description of BMP: **The County will use an ordinance or other regulatory mechanism to address post – construction runoff from new development and redevelopment projects to the extent allowable under State and local law** *(See Attachment: D1–Soil E&S, Pollution Control Ordinance).*

2. Measurable goal(s): **The County will evaluate the existing stormwater ordinance, and if necessary, modify the ordinance during the reporting period.**

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

4. Schedule:
   a. Interim milestone dates (if applicable): **2010 (2012 – Revised)**
   b. Implementation dates (if applicable): **2006 (E&S Ord)**
   c. Frequency of actions (if applicable): **As Needed**
   d. Month/Year of each action (if applicable): **N/A**

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

6. Rationale for choosing BMP and setting measurable goal(s): **The stormwater ordinance ensures that controls are in place that will prevent or minimize water quality impacts.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **Through enforcement of the stormwater ordinance, this will ensure that post – construction stormwater is being handled properly.**

B. BMP #2: Inventory of Post-Construction Storm Water Management Facilities

1. Description of BMP: **The County has a completed inventory of all post-construction storm water structures and those structures designed after the December 9, 2008 deadline for adoption of the GSMM (e.g. new structures)** *(See Attachments:* County-owned Detention Ponds (*E1 – County DPond Inventory) and* Privately-owned Detention Ponds *(E2 – Private DPond Inventory))*. **The County will update its permitted urban area (UA) Detention Pond inventory to include the 2010 census results.**

2. Measurable goal(s): **The County will update the inventory to include structures added during the reporting period.**

3. Documentation to be submitted with each annual report: **The County will provide the revised inventory in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): **2010**
   b. Implementation dates (if applicable): **2006 – Inventory**
   c. Frequency of actions (if applicable): **Annually**
   d. Month/Year of each action (if applicable): **January**

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

6. Rationale for choosing BMP and setting measurable goal(s): **It is important to continuously maintain the post – construction information to identify problems and ensure proper functions.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **By having accurate information, the County can respond quickly and take the necessary steps to ensure**

BMP #3: Inspection Program

1. Description of BMP: **LC staff will inspect 100% of county and privately owned ponds within the 5-year permit period. Each inspection is documented and if maintenance and/or repairs are needed, the owner will be notified.** *(See attachment: E3-Stormwater Facility Inspection Form).* **For information on County pond inspections program see attachment:** *E4-MS4 Inspection, Maintenance and Waste Disposal Procedure.*

2. Measurable goal(s): **LC will inspect 20% of MS4 facilities during the reporting period.**

3. Documentation to be submitted with each annual report: **The County will provide a summary of all inspections and copies of the inspections documents in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation date (if applicable): **2005**
   c. Frequency of actions (if applicable): **Annually**
   d. Month/Year of each action (if applicable): **N/A**

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

6. Rationale for choosing BMP and setting measurable goal(s): **Routine visual inspection is an effective way to identify a variety of problems and to help ensure that each pond is functioning as designed.**

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **Periodic inspections are effective in evaluate maintenance needs of each facility in order to keep them functioning properly. Documenting the process of inspection/maintenance ensures a reduction of stormwater pollution from urban development.**

BMP #4: Maintenance Program

1. Description of BMP: **LC will implement a long-term operation and maintenance program for post-construction stormwater management structures (ponds). The maintenance program will facilitate all county-owned structure repairs through the use of work orders** (see attachment: E4-MS4 Inspection, Maintenance and Waste Disposal Procedure & E5-MS4 Maintenance Work Order form) **and those privately-owned structures with construction completed after the effective date of the permit** (**December 6, 2012). All privately**

maintained ponds will be required to have and adhere to a maintenance agreement. LC will retain copies of all the maintenance agreements.

2. Measurable goal(s): **LC will provide a list of county-owned structures, the type of maintenance performed, including documentation of maintenance activities performed during the reporting period. LC will also provide a list of the privately-owned structures constructed after the effective date of the permit and the total number of executed maintenance agreements.** *(See attachment: E6 – Facility Maintenance Agreement).*

3. Documentation to be submitted with each annual report: **The County will provide a summary of all maintenance performed and copies of maintenance work orders implemented annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation date (if applicable): **January 2013**
   c. Frequency of actions (if applicable): **Annually**
   d. Month/Year of each action (if applicable): **N/A**

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

6. Rationale for choosing BMP and setting measurable goal(s): **Regular pond maintenance will help to ensure that they are operating as designed.**

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **Properly maintaining detention/retention ponds reduces the amounts of sediment and other pollutants leaving urban development.**

BMP #5: Green Infrastructure/Low Impact Development (GI/LID) Structures

1. Description of BMP: **The County will maintain an inventory of water quality –related GI/LID structures located within the permitted area and at a minimum, constructed after the effective date of the permit (December 6, 2012). As of August 13, 2013, no GI/LID structures have been constructed. The County will update its permitted urban area (UA) GI/LID inventory to include the 2010 census results.**

2. Measurable goal(s): **The County will document each GI/LID structure constructed during the reporting period.**

3. Documentation to be submitted with each annual report: **The County will provide the GI/LID inventory, which will include the total number of each type of structure (e.g. bio-swales, pervious pavement, rain gardens, cisterns, and green roofs) in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): **2020**
   b. Implementation dates (if applicable): **August 2013 (Inventory)**
   c. Frequency of actions (if applicable): **Annually**
   d. Month/Year of each action (if applicable): **January**

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

6. Rationale for choosing BMP and setting measurable goal(s): **Green infrastructure/ LID are approaches that communities can choose to maintain healthy waters and provide multiple environmental benefits.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit**: By incorporating natural processes into the built environment, stormwater management can be improved.**

BMP#6: Post-Construction Ordinance Evaluation

1. Description of BMP: **The County will assess its ordinances to ensure they do not prohibit or impede the use of GI/LID practices, including infiltration, reuse, and evapotranspiration. At a minimum, the County shall assess the regulations governing road design and parking requirements**. (See Attachment: E7-GI-LID Ordinance Evaluation 2013 – Center for Watershed Protection – Code of Ordinances Worksheet Preliminary Evaluation).

2. Measurable goal(s): **The County will evaluate the ordinances to ensure they allow the use of GI/LID practices.**

3. Documentation to be submitted with each annual report**: The County will provide a written report to EPD with the 2014 annual report, which is due February 15, 2015. If ordinance revisions are needed, they must be adopted and submitted to EPD within four years of the effective date of the Permit (December 6, 2016).**

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation dates (if applicable): **February 2015 – Evaluation December 2016 – Revisions (if needed)**
   c. Frequency of actions (if applicable): **Annually**
   d. Month/Year of each action (if applicable): **N/A**

5. Person (position) responsible for overall management and implementation of the BMP: **County Engineer and Planning & Zoning Administrator.**

6. Rationale for choosing BMP and setting measurable goal(s): **Green infrastructure / LID are approaches that communities can choose to maintain healthy waters and provide multiple environmental benefits.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **By incorporating natural environmental processes into the manmade (built) environment, stormwater management can be improved to emulate natural runoff conditions.**

MCM-F
Pollution Prevention/Good Housekeeping for Municipal Operations

40 CFR Part 122.34(b)(6) Requirement: The permittee 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. Using training materials available from the USEPA and other organizations as guidance, the permittee must, as a part of this program, include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.

See Table 4.2.6 (a) of the Permit

A. BMP #1: MS4 Control Structure Inventory and Map

1. Description of BMP: **LC will update the inventory and map of the MS4 control structures (e.g. catch basins, drainage easements, ponds, and storm drain lines). The County will update its permitted urban area (UA) MS4 inventory and map to include the 2010 census results.**

2. Measurable goal(s): **LC will provide an update of the number of structures added and a revised map each year.**

3. Documentation to be submitted with each annual report: **The County will provide the inventory of stormwater facilities added during the reporting period, the total number of existing structures and an updated MS4 map in each annual report.** (See attachments: F1-MS4 Map and F2-MS4 Inventory).

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation date (if applicable): **2005**
   c. Frequency of actions (if applicable): **Annually**
   d. Month/Year of each action (if applicable): **January**

5. Person (position) responsible for overall management and implementation of the BMP: **GIS Asset Coordinator**

6. Rationale for choosing BMP and setting measurable goal(s): **Updating the MS4 control structure inventory will provide for the proper operation and maintenance of the storm sewer system.**

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **Maintaining a current MS4 map and inventory database of specific stormwater structures ensures the monitoring of all possible points of stormwater pollution.**

B. BMP #2: Inspection Program

1. Description of BMP: **LC will conduct inspections of the county's MS4 control structures (i.e., catch basins, drainage easements, detention/retention ponds). All MS4 maintenance requirements will be identified and scheduled as needed (e.g. cleaning catch basins & drainage easements, and/or repairing structures).**

2. Measurable goal(s): **LC will conduct inspections of at least 20% of the MS4 structures annually.**

3. Documentation to be submitted with each annual report: **The County will provide copies of inspection forms and the sum and percentage of MS4 facilities inspected in each annual report.** (See attachment: E4-MS4 Inspection, Maintenance and Waste Disposal Procedure manual & E3-Stormwater Facility Inspection Form)

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation date (if applicable): **2005**
   c. Frequency of actions (if applicable): **Annually**
   d. Month/Year of each action (if applicable): **Annually**

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

6. Rationale for choosing BMP and setting measurable goal(s): **The implementation of the county's MS4 inspection program 20% of all components of the MS4 control structures (listed above), will result in a 100% inspection performed of the entire MS4 inventory in a 5-year reporting period.**

7. How you will determine whether this BMP is effective in accordance with Part 5.1.4 of the Permit: **An inspection program of the MS4 inventory is vital to ensuring the proper operation of all components of stormwater system, thereby, facilitating any necessary repairs of structures and the removal of sediment and pollutants from the ms4, thereby reducing stormwater pollution.**

BMP #3: MS4 Maintenance Program

1. Description of BMP: **The County will perform maintenance on the MS4 control structures (e.g. catch basins, ditches, and storm pipes) as needed. Maintenance will be documented using work order forms.**

2. Measurable goal(s): **The County will perform maintenance, as needed, on its MS4 control structures during each reporting period.**

3. Documentation to be submitted with each annual report: **The County will provide documentation of all maintenance activity performed for of each type of structure maintained with copies of work orders in each annual report.** (See attachment: E5-MS4 Maintenance Work Order Form. Also see attachment: E4-MS4 Inspection, Maintenance and Waste Disposal Procedure).

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation dates (if applicable): **N/A**
   c. Frequency of actions (if applicable): **Continuous**
   d. Month/Year of each action (if applicable): **N/A**

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

6. Rationale for choosing BMP and setting measurable goal(s): **Routine maintenance of catch basins, ditches, and storm pipes helps to prevent potential flooding issues, reduce the need for major repair maintenance, and reduce the amount of pollutants in stormwater runoff by finding and fixing problems.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **By performing regular maintenance this will help maintain the proper operation of the MS4, while also reducing the amount of debris reaching the waters of the State.**

BMP #4: Street and Parking Lot Cleaning

1. Description of BMP: **The County removes trash/litter to reduce pollutants from streets, parking lots, and municipal facilities within the unincorporated Urbanized Area.**

2. Measurable goal(s): **The County will document the trash/litter activities during the reporting period.**

3. Documentation to be submitted with each annual report: **The County will provide the total number of bags collected and the street locations and/or parking lots of collections in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation dates (if applicable): **N/A**
   c. Frequency of actions (if applicable): **As weather permits**
   d. Month/Year of each action (if applicable): **N/A**

5. Person (position) responsible for overall management and implementation of the BMP: **Public Works Department and Engineering Department.**

6. Rationale for choosing BMP and setting measurable goal(s): **By removing debris from the streets this will help improve safety along the roadways and reduce debris from entering the catch basins, storm pipes and waterways.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **Trash/litter cleanup reduces pollutants from entering the waters of the State.**

BMP #5: Employee Training

1. Description of BMP: **The County provides educational opportunities to employees on the importance of stormwater pollution prevention/good housekeeping techniques through classroom training.**

2. Measurable goal(s): **The County will provide an annual training session during each reporting period.**

3. Documentation to be submitted with each annual report: **The County will submit documentation of the number of employees** (see attachment: F3 - Employee Stormwater Training Sign-in Sheet) **with the use if a sign-in sheet and the description of educational information shared in each annual reporting period.**

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation dates (if applicable): **2007**
   c. Frequency of actions (if applicable): **Annually**

d. Month/Year of each action (if applicable): **N/A**

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

6. Rationale for choosing BMP and setting measurable goal(s): **By educating County employees on pollution prevention/good housekeeping measures into municipal operations, will ensure that everyone is knowledgeable and proficient in the newest and most effective approaches to minimizing pollutant discharges from municipal facilities and activities.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **Educating County employees are one of the most important aspects of pollution prevention and good housekeeping.**

BMP #6: Waste Disposal

1. Description of BMP: **The County removes debris from catch basins, other structures, and during street sweeping activities as part of the maintenance of the MS4. The debris that is collected is disposed of in a dumpster, which is then taken to the landfill**. See Attachment E4 – MS4 Inspection, Maintenance, and Waste Disposal Procedures.

2. Measurable goal(s): **The County will follow the waste disposal procedures when debris is removed from the MS4 during the reporting period.**

3. Documentation to be submitted with each annual report: **The County will provide the total number of structures cleaned in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation dates (if applicable): **2013 – Develop Procedures**
   c. Frequency of actions (if applicable): **Continuous**
   d. Month/Year of each action (if applicable): **N/A**

5. Person (position) responsible for overall management and implementation of the BMP: **Stormwater Technician**
6. Rationale for choosing BMP and setting measurable goal(s): **The cleaning and removal of debris from the MS4 will reduce the amount of pollutants and trash from entering the waters of the State.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **The Stormwater Division will document all MS4 inspections and cleanings**.

BMP #7: New Flood Management Projects

1. Description of BMP: **The County will evaluate new municipal flood management projects (e.g. detention / retention ponds) as of December 6, 2012 to ensure they are assessed for water quality impacts during the design phase**. See Attachment: F4 – Flood Management Project Design Checklist and Water Quality Improvement Worksheet: Proposed MS4 Facility Forms.
2. Measurable goal(s): **The County will document the plans reviewed where flood management projects were assessed for water quality impacts during the reporting period.**

3. Documentation to be submitted with each annual report: **The County will provide the number of plans reviewed where flood management projects were assessed for water quality impacts in each annual report**.

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation dates (if applicable): **N/A**
   c. Frequency of actions (if applicable): **As needed**
   d. Month/Year of each action (if applicable): **N/A**

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

6. Rationale for choosing BMP and setting measurable goal(s): **To ensure all proposed flood management projects are designed for water quality to prevent further degradation of waters of the state.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **By addressing water quality impacts at the design phase, this will reduce pollution significantly and provide long term water quality benefits.**

BMP #8: Existing Flood Management Projects

1. Description of BMP: **The County will conduct an assessment of the existing publicly-owned flood management projects (e.g. detention /**

retention ponds) for potential retrofitting to address water quality impacts so that 100% are evaluated within the 5-year permit term. See Attachment: F5 – Water Quality Improvement Worksheet: Existing MS4 Facility Form.

2. Measurable goal(s)**: The County will assess 20% of the existing publicly – owned flood management projects during the reporting period.**

3. **Documentation to be submitted with each annual report: The County will provide a summary of the flood management projects assessed in each annual report.**

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

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

6. Rationale for choosing BMP and setting measurable goal(s): **By evaluating the existing ponds, this will provide the potential to expand the function for a pond that only address volume to include water quality benefits.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit**: By identifying the ponds that need to be modified and tracking the completion date of each retrofit.**

BMP #9: Municipal Facilities

1. Description of BMP: **The County maintains the inventory of municipal facilities with the potential to cause pollution. See Attachment:** F6 – Municipal Facilities Inspection List**. The Pollution Prevention Plan of each facility with a significant capability to discharge hazardous chemicals into the waters of the State will be audited**. See Attachment: F7 – Municipal Facility Pollution Prevention Plans Inspection Form.

2. Measurable goal(s): **The County will inspect all facilities within the 5 – year permit term.**

3. Documentation to be submitted with each annual report: **The County will provide documentation of the inspections conducted in each annual report.**

4. Schedule:
   a. Interim milestone dates (if applicable): **N/A**
   b. Implementation dates (if applicable): **2007**
   c. Frequency of actions (if applicable): **Annually**
   d. Month/Year of each action (if applicable): **N/A**

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

6. Rationale for choosing BMP and setting measurable goal(s): **It is necessary to provide for the proper storage and containment of chemicals, lubricants and fuels to prevent accidental discharge to the waters of the State.**

7. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit: **By inventorying all facilities with the potential to negatively impact water quality and routinely inspect each facility, actions will be taken to prevent pollutants from being released into waters of the State.**

Appendix - A

Enforcement Response Plan

1. The MS4 must develop and implement an Enforcement Response Plan (ERP) that describes the action to be taken for violations of the Storm Water Management Program. The ERP must be completed and submitted with the second annual report following permit issuance, February 15, 2014.

   Final completion date: 09/10/2014
   Date of submittal to EPD: 02/15/2014

2. In accordance with Part 4.3 of the NPDES Permit, the ERP must include escalating enforcement responses for repeat and continuing violations. At a minimum, the ERP must address the following categories (refer to Part 4.3 of the NPDES Permit for more detail):
   - Names of ordinances and citations;
   - Types of enforcement mechanisms;
   - Description of the use of these enforcement mechanisms;
   - Time frames; and
   - Description of the tracking and reporting mechanism.

NOTE: Upon completion, the ERP will be included as an Appendix to the SWMP.

Appendix - B

Impaired Waters

1. Population based on the 2010 U.S. Census: **109,233**

   If the population is less than 10,000, then see items #2 and #3 below.

   If the population exceeds 10,000, then see items #4 and #5 below.

2. If the population is less than 10,000, then the MS4 must develop an Impaired Waters Plan (see Part 4.4.1 of the NPDES Permit) including:
   - A list of impaired waters and the pollutant(s) of concern;
   - A map showing the location of the impaired waters and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters;
   - BMPs that will be implemented to address each pollutant of concern; and
   - A schedule for implementing the BMPs.

3. The Impaired Waters Plan must be submitted with the annual report due February 15, 2018.

   Final completion date/date of submittal to EPD:

4. If the population exceeds 10,000, then the MS4 must develop an Impaired Waters Plan/Monitoring and Implementation Plan (see Part 4.4.2 of the NPDES Permit) including:
   - A list of impaired waters and the pollutant(s) of concern.
   - A Monitoring and Implementation Plan, that includes:
     a. Sample location;
     b. Sample type, frequency, and seasonal considerations;
     c. Monitoring implementation schedule;
     d. A map showing the location of the impaired waters and all identified MS4 outfalls located on the impaired waters or occurring within one linear mile upstream of the waters or a schedule for confirming those outfalls; and
     e. Description of proposed BMPs.
   - Description of the method used to annually assess data trends for each pollutant of concern.

5. The Impaired Waters Plan/Monitoring and Implementation Plan must be submitted with the annual report due February 15, 2018.

   Final completion date/date of submittal to EPD: 12/15/2018

NOTE: Upon completion, the Impaired Waters Plan will be included as an Appendix to the SWMP.