



# Stormwater Management Plan

*For The*

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

*Prepared For*

**City of Newnan**

**May 29, 2013**

*Prepared By*



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**City of Newnan**

August 26, 2013

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**STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES  
ENVIRONMENTAL PROTECTION DIVISION**

**STORMWATER MANAGEMENT PROGRAM (SWMP)**

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

**1. General Information**

- A. Name of small MS4: City of Newnan, GA
- B. Name of responsible official: Keith Brady  
Title: Mayor  
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**2. Sharing Responsibility**

- A. Has another entity agreed to implement a control measure on your behalf?  
Yes \_\_\_\_\_ No  (If no, skip to Part III)

**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. Appendices

\* A minimum of two BMPs per minimum control measure is required.

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: Keith Brady Date: \_\_\_\_\_

Signature: \_\_\_\_\_ Title: Mayor

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- Appendix D – Outfall / State Waters Map & MS4 Outfall Inventory
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- Appendix H – E&S Site Inspection Form
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### **Acronyms**

BMP – Best Management Practice

CGP – Construction General Permit

DNR – Department of Natural Resources

EPA – Environment Protection Agency

EPD – Environmental Protection Division

ERP – Enforcement Response Plan

ESPCP – Erosion, Sediment, and Pollution Control Plan

E&S – Erosion & Sedimentation

GESA – Georgia Erosion & Sedimentation Act

GI – Green Infrastructure

GSMM – Georgia Stormwater Management Manual

GSWCC – Georgia Soil and Water Conservation Commission

IDDE – Illicit Discharge Detection & Elimination

KNB – Keep Newnan Beautiful

LDM – Local Design Manual

LDA – Land Disturbing Activity

LID – Low Impact Design

MNGWPD – Metropolitan North Georgia Water Planning District

MS4 – Municipal Separate Storm Sewer System

NPDES – National Pollutant Discharge Elimination System

POC – Pollutant of Concern

SWMP – Stormwater Management Plan

TMDL – Total Maximum Daily Load

## Introduction

The document contained herein provides the specifications that will outline the City of Newnan, Georgia's plan to address the requirements of the National Pollutant Discharge Elimination System (NPDES) Phase II Municipal Separate Storm Sewer System (MS4) program. The activities shown herein are collectively known as Newnan's (City) Stormwater Management Program (SWMP) to address the requirements of the State of Georgia (State) Department of Natural Resources (DNR) Environmental Protection Division (EPD) General NPDES Stormwater Permit No. GAG610000 (permit). The City has developed this SWMP in close consultation with the permit and believes that the SWMP will serve as a valuable means of addressing the requirements of the permit as well as addressing water pollution control in the City's streams and rivers. Please note this SWMP is designed to address the requirements of the permit within the City of Newnan and does not represent the entirety of the City's overall Stormwater Management Program.

This SWMP has been divided into eight (8) major sections. The first six sections of the SWMP focus on the six minimum control measures that form the core of the NPDES Phase II MS4 program. They are as follows:

- Public Education and Outreach
- Public Involvement
- Illicit Discharge Detection and Elimination (IDDE)
- Construction Site Stormwater Runoff Control
- Post-Construction Stormwater Management
- Pollution Prevention / Good Housekeeping

Each minimum control measure contains multiple Best Management Practices (BMPs) or activities that will serve as the City's compliance strategy for meeting the requirements of the permit.

The final two sections of the SWMP focus on the City's Enforcement Response Plan and Impaired Waters monitoring / implementation plan. These two sections have not traditionally been part of the NPDES Phase II MS4 program but have been added as part of the latest permit issuance.

## **Public Education and Outreach on Stormwater Impacts**

**Permit 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 stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

**Response:** Newnan has developed several Best Management Practices (BMPs) based on reaching the community through a number of methods to provide information on the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. It is the City's belief that the mix of BMPs will ensure that a majority of the businesses and residents will be reached at least once each year. The following pages outline each BMP and the goals / implementation schedules applicable to each activity.

## **Best Management Practice (BMP) #A1 – School Education**

**1. Target Audience:** School Children

**2. Description of BMP:**

The City of Newnan educates School Children on the importance of our water resources through a series of brochures and workshops. The brochures and workshops are developed by the City of Newnan using information found on EPA's website for Kids and Water ([www.epa.gov/safewater/kids/index.html](http://www.epa.gov/safewater/kids/index.html)).

**3. Measurable Goal(s):**

It is the goal of the City of Newnan to educate school children on the importance of our water resources by annually dispersing brochures to all 6th grade classes in Coweta County and performing a minimum of 3 live workshops to select classes. Each class will receive the same brochure but the topic will be changed from year to year. The live workshops will be directly related to the annual topic on the brochure.

- Distribute brochures to every 6<sup>th</sup> grade class room in Coweta County once per year.
- Conduct a minimum of 3 live workshops for select classes per year on the same topic as the brochure for that year.

**4. Documentation to be Submitted with each annual report:**

- Brochure Sent to All 6<sup>th</sup> Graders
- Summary of Live Demonstration and List of Classes to which it was Presented

**5. Schedule:**

a. Interim Milestone Dates (if applicable):

- Determine the annual topic of the brochure by August of each permit year.
- Contact the school system to identify candidates for the live workshop by August of each permit year.
- Identify a minimum of three classes or groups of classes that will receive live workshops by August of each permit year.
- Determine the number of brochures needed by August of each permit year.
- Develop and print the brochures by September of each permit year.

b. Implementation Date (if applicable):

- Disperse the brochures by October of each permit year.
- Conduct the live workshops by October of each permit year.

*(Continued on Next Page)*

c. Frequency of Actions (if applicable):

- Annually

d. Month / Year of Each Action (if applicable):

- October 2013 – Distribute Brochures & Conduct Workshops
- October 2014 – Distribute Brochures & Conduct Workshops
- October 2015 – Distribute Brochures & Conduct Workshops
- October 2016 – Distribute Brochures & Conduct Workshops
- October 2017 – Distribute Brochures & Conduct Workshops

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

Rob Hill (Engineering Inspector / Stormwater)

7. **Rationale for choosing BMP and setting measurable goal(s):**

Classroom education is an integral part of any storm water pollution outreach program. Providing storm water education through schools exposes the message not only to students but will help promote public awareness. These children will learn about environmental issues and will therefore become interested and perhaps involved at earlier ages. Schoolchildren often tell their parents what they learn in school. Therefore, teaching children about storm water is an effective way to pass environmental awareness to their parents and throughout the entire community.

8. **How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:**

Although not a direct indicator of water quality in the streams and rivers of the City, it is believed that education will have an intangible benefit on water quality and documenting the class rooms reached each year will insure that the population of Newnan that has received some form of outreach is continually increasing. For the purposes of this SWMP, the BMP will be deemed effective if the brochures are sent to all 6<sup>th</sup> Grade Classes and at least three classes receive live demonstrations each year.

## **Best Management Practice (BMP) #A2 – Construction Site Operator Education**

**1. Target Audience:** Construction Site Operators

**2. Description of BMP:**

The City of Newnan distributes Storm Water Educational and Ordinance Brochures to all developer, builders, or contractors receiving a Land Disturbance Permit from the City of Newnan Building Department. The brochure highlights examples of quality BMP's that may be used in the field to protect our water resources during the critical time of land disturbance. The brochure also includes any new or updated water quality information as it relates to local, state, or federal law. The brochure is reviewed and changed on an annual basis. Please see Appendix S for our updated Brochure.

**3. Measurable Goal(s):**

It is the goal of the City of Newnan to inform local developers, builders, and grading contractors of educational topics and ordinance requirements by distributing brochures to 100% of the persons who receive a Land Disturbance Permit.

**4. Documentation to be Submitted with each annual report:**

- Example of brochure distributed that year
- Estimate of number of brochures distributed that year

**5. Schedule:**

a. Interim Milestone Dates (if applicable):

- Select the topics for the brochure by February of each permit year.
- Design the brochure by March of each permit year.
- Print the brochures by March of each permit year.

b. Implementation Date (if applicable):

- Begin dispersing the brochures by April of each permit year.

c. Frequency of Actions (if applicable):

- The brochure is to be handed out with every Land Disturbance Permit issued by the City of Newnan Building Department.

d. Month / Year of Each Action (if applicable):

- March 2013 – Select New Brochure for Distribution and Begin Providing with LDPs
- March 2014 – Select New Brochure for Distribution and Begin Providing with LDPs
- March 2015 – Select New Brochure for Distribution and Begin Providing with LDPs
- March 2016 – Select New Brochure for Distribution and Begin Providing with LDPs
- March 2017 – Select New Brochure for Distribution and Begin Providing with LDPs

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

Dana McCauley (Civil Engineer)

**7. Rationale for choosing BMP and setting measurable goal(s):**

It is very important that developers, builders, and grading contractors understand the importance of keeping siltation on site and out of receiving waters. This targeted educational program will make the development community more aware of proper soil and erosion techniques and also make them aware of ordinance requirements and sanctions for violation of such requirements.

**8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:**

Although not a direct indicator of water quality in the streams and rivers of the City, it is believed that education will have an intangible benefit on water quality. The City wishes to ensure that land disturbance permit holders are aware of the City's focus on water quality and desire to protect local water resources. The City believes that this BMP will be an effective practice to protecting water quality by ensuring that each permit includes literature discussing water quality protection means. For the purposes of this SWMP, this BMP will be considered effective if a brochure is made available to all persons securing a Land Disturbance Permit.

## **Best Management Practice (BMP) #A3 – Public Service Announcements**

**1. Target Audience:** School Children

**2. Description of BMP:**

The City of Newnan designs and airs Radio Public Service Announcements (PSA) regarding the importance of our water resources. The City annually develops two (2) PSA's that air on local radio stations.

**3. Measurable Goal(s):**

It is the goal of the City of Newnan to annually develop two (2) water resources PSA's that will air on local radio stations per year. The PSA's will be aired on the local radio stations a minimum of 100 times per year.

**4. Documentation to be Submitted with each annual report:**

- Documentation of when PSAs were played

**5. Schedule:**

a. Interim Milestone Dates (if applicable):

- Select the topics for the two (2) PSA's by July of each permit year.
- Contact the Directors of the radio stations about airing of the PSA's by July of each permit year.
- Design the PSA's by July of each permit year.
- Enter into an agreement with the radio stations about airing the PSA's a minimum of 100 times per year by July of each permit year.

b. Implementation Date (if applicable):

- Begin airing of the PSA's by August of each permit year.

c. Frequency of Actions (if applicable):

- The PSAs will air at least 100 times over the permit year.

d. Month / Year of Each Action (if applicable):

- New and/or updated PSA's will be aired throughout each permit year beginning in August. The annual program will follow the same milestone dates as established above.

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

Gina Snider (Public Information Officer)

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**7. Rationale for choosing BMP and setting measurable goal(s):**

Pollutants from everyday household activities such as lawn fertilizing and car washing can substantially impact nearby receiving waters. Delivering educational messages to homeowners is a very important, albeit, time consuming task. The City has determined that the most effective way to introduce household pollution prevention techniques is through a series of radio public service announcements. Use of the local radio stations will allow these announcements to reach thousands of households on multiple occasions.

**8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:**

Although not a direct indicator of water quality in the streams and rivers of the City, it is believed that education will have an intangible benefit on water quality. By ensuring that the PSAs are played multiply times on the local radio stations, it is believed that a large number of residents can potentially be exposed to the various messages. The City will endeavor to ensure that the PSAs are played a minimum of 100 times per year to achieve this goal.

## **Best Management Practice (BMP) #A4 – Stormwater Facebook Page**

**1. Target Audience:** General Public

**2. Description of BMP:**

Given the popularity of Facebook.com, the City has established a facebook page on Facebook to assist in distributing information and updating the public on the activities of the City. The City will update the Facebook page a minimum of one time (1x) per month with messages about the program, photos of stormwater issues around the city, stormwater projects that the City has completed, etc.

**3. Measurable Goal(s):**

- The City will update the Newnan Facebook page a minimum of one time (1x) per month with stormwater materials.

**4. Documentation to be Submitted with each annual report:**

- Estimate of number of stormwater related posts to City's facebook page each year
- Provide a screen shot of examples of representative posts from that year

**5. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): N/A
- c. Frequency of Actions (if applicable):
  - Monthly updates
- d. Month / Year of Each Action (if applicable):
  - September 2013 – Initial update of the Facebook page
  - Monthly updates throughout the permit period

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

Rob Hill (Engineering Inspector / Stormwater)

*(Continued on Next Page)*

**7. Rationale for choosing BMP and setting measurable goal(s):**

The City believes education of the public is an effective means of developing long term awareness of activities that can threaten water quality in local water ways. Additionally, with the popularity of Facebook, the BMP will provide an additional means of distributing information about the impacts of stormwater on local water resources via social media. Given the fact that Facebook does not provide usage statistics on how often the page is viewed, the City will utilize updates as a means of measuring the effectiveness of the BMP. Given that every update will automatically show up in the news feed of a person who has “liked” the page, this will ensure that it is viewed by users.

**8. 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 City will report the number of updates to the page as part of the City’s annual report due on February 15<sup>th</sup> of each year the permit is in effect. Although not a direct indicator of water quality in the streams and rivers of the County, it is believed that education will have an intangible benefit on water quality. For the purposes of this SWMP, the BMP will be deemed effective if the City updates the Facebook page at least 12 times per year (except for 2013) with stormwater related messages.

## Public Involvement / Participation

**Permit Requirement:** The permittee must, at a minimum, comply with State and local public notice requirements when implementing a public involvement / participation program. The permittee is encouraged to make the approved SWMP publicly accessible electronically or by other means.

**Response:** Newnan has developed several Best Management Practices (BMPs) based on providing avenues for the community through a number of methods to provide input on the impacts of stormwater discharges on water bodies and the steps that the public can take to comment on the City's SWMP. As part of this effort, the City will include a copy of the EPD approved SWMP on the City's webpage as well as comply with all Open Records requests for viewing and / or obtaining a copy of the SWMP. The following pages outline each BMP and the goals / implementation schedules applicable to each activity.

## **Best Management Practice (BMP) #B1 – Storm Drain Marking**

**1. Target Audience:** General Public

**2. Description of BMP:**

The City of Newnan began a Storm Drain Marking Program that involves gluing markers which tell citizens not to dump things in the storm drains. This BMP is performed by volunteers such as boy scouts, civic clubs, school students, or City employees. After the location is chosen to mark, City Staff reaches out to school groups, community groups, and organizations in the area surrounding the marking location to seek volunteers. The volunteers are provided with a map of which storm drains are to be marked. The volunteers are supervised by a trained City employee.

**3. Measurable Goal(s):**

It is the goal of the City of Newnan to utilize volunteer groups to glue 100 markers a year with the logo “Only Rain Down the Drain – No Dumping”. It will take several years to mark all storm drains. After all storm drains have been marked, the program will revert to inspecting 200 storm drains per year and remark where necessary.

**4. Documentation to be Submitted with each annual report:**

- Identification of the number of storm drains marked in that year
- Map illustrating the location of the storm drains marked

**5. Schedule:**

a. Interim Milestone Dates (if applicable):

- Identify cooperating volunteer group by June of each permit year.
- Sign a Memorandum of Understanding with the volunteer group(s) by August of each permit year.
- Meet with the volunteer group(s) to distribute markers and glue and provide instructions by September of each permit year.

b. Implementation Date (if applicable):

- Begin gluing the storm drain markers by October of each permit year.

c. Frequency of Actions (if applicable):

- Storm drains will be marked annually.

d. Month / Year of Each Action (if applicable):

- October 2013 – Mark 100 Storm Drains
- October 2014 – Mark 100 Storm Drains
- October 2015 – Mark 100 Storm Drains
- October 2016 – Mark 100 Storm Drains
- October 2017 – Mark 100 Storm Drains

*(Continued on Next Page)*

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

Tracy Dunnavant (City Planner)

**7. Rationale for choosing BMP and setting measurable goal(s):**

Storm drain marking projects offer an excellent opportunity to educate the public about the link between the storm drain system and water quality. The benefits of using volunteers are lower cost and increased public awareness of storm water pollutants and their path to water bodies. In addition to these benefits, media coverage of the program or marking event can increase public awareness of storm water issues.

City Staff seek the volunteer group(s) in close proximity to the storm drain marking locations. This is done for a couple different reasons. One, being to make it easy for the group(s) to attend being close by. The second being to seek the interest in groups wishing to help the environment they live and/or go to school. City Staff typically contacts the interest group(s) through telephone conversations, e-mail and/or letters.

**8. 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 City believes that this BMP will provide a dual purpose of providing great awareness for volunteers that perform the storm drain marking by helping them to understand the connection between drainage system inlets and local streams and water bodies. Additionally, this BMP will serve as a longer term educational tool for those who don't participate in the marking event since the storm drain markers remain educating those who see them in the future. Although not a direct indicator of water quality in the streams and rivers of the City, it is believed that education will have an intangible benefit on water quality. By ensuring that the City's storm drains are marked and in later years, remarked, it is believed that potential illicit discharges and dumping may be avoided. For the purpose of this SWMP, this BMP will be deemed effective if 100 storm drains are marked per year or confirmed to be marked in later years after all drains have been marked at least once in the City.

## **Best Management Practice (BMP) #B2 – Adopt-A-Street Program**

**1. Target Audience:** General Public

**2. Description of BMP:**

The Adopt-A-Street program is an ongoing program in Newnan administered by the Keep Newnan Beautiful program. The purpose of the program is to provide an organized program to remove litter from public rights-of-way within the City via volunteer groups. Litter is collected by volunteers and placed in City provided trash bags. Following collection of the litter, the bags are then placed along the roadway and City personnel collect and properly dispose of the litter.

Information for this program is available to the public at the Keep Newnan Beautiful website: [www.keepnewnanbeautiful.org](http://www.keepnewnanbeautiful.org) as well as brochures provided by Keep Newnan Beautiful. The Adopt-A-Street Program currently has 54 volunteer groups. Please see Appendix S for our Adopt-A-Street Participating Groups List and Brochure.

**3. Measurable Goal(s):**

- The City will continue to support the Adopt-A-Street Program.
- The City will report the number of clean up events conducted during the permit year as part of the City's annual report due on February 15<sup>th</sup> of each year the permit is in effect.
- The City will estimate the amount of litter removed from the road rights-of-way during the permit year as part of the City's annual report due on February 15<sup>th</sup> of each year the permit is in effect.

**4. Documentation to be Submitted with each annual report:**

- Identification of number of clean up events held during the permit year
- Estimate of the amount of litter removed from the roads / rights-of-way
- Revised listing of volunteer groups

**5. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable):
  - 2013
- c. Frequency of Actions (if applicable):
  - On-going
- d. Month / Year of Each Action (if applicable):
  - On-going

*(Continued on Next Page)*

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

Carol Duffey (Keep Newnan Beautiful Coordinator)

**7. Rationale for choosing BMP and setting measurable goal(s):**

The Adopt-A-Street program has been in place for a number of years in Newnan and serves as a valuable tool for reducing litter in the community as well as providing an effective means of reducing the amount of trash and debris that enters the City's MS4. As a result of the volunteers' efforts, City resources can be more effectively utilized in other areas of need within the Stormwater Management Program.

**8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:**

Given that much of the City's rights-of-way include ditches and drainage systems (i.e. MS4 components), removal of litter from the right-of-way prevents gross pollutants from entering the MS4 and being discharged to streams and rivers. By measuring the amount of litter removed from the roads, the amount of pollution that would have entered the City's streams and rivers can be determined. For the purposes of this SWMP, the BMP will be deemed effective if the City continues the program and reports the amount of litter removed from the rights-of-way per year.

## **Best Management Practice (BMP) #B3 – E-Collection Recycling Program**

**1. Target Audience:** General Public

**2. Description of BMP:**

The E-Collection Recycling Program is an ongoing program in Newnan administered by the Keep Newnan Beautiful program. The purpose of the program is to provide an organized program to encourage the proper recycling / disposal of electronics within the City of Newnan. Each year, the City organizes a minimum of one event whereby residents can bring their old electronics and dispose of them properly. Examples of electronics that can be disposed of for recycling include computers, monitors TVs, cell phones, ink cartridges, household batteries, etc.

**3. Measurable Goal(s):**

- The City will conduct at least one recycling event per year whereby residents can bring their electronics to a central facility (typically City Hall) to properly dispose of them.
- The City will report the amount of materials collected each year as part of the City's annual report due on February 15<sup>th</sup> of each year the permit is in effect.

**4. Documentation to be Submitted with each annual report:**

- Report of the day(s) E-Collection events were held
- Estimate of the amount e-waste collected at the event(s)

**5. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable):
  - 2013
- c. Frequency of Actions (if applicable):
  - On-going
- d. Month / Year of Each Action (if applicable):
  - On-going

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

Carol Duffey (Keep Newnan Beautiful Coordinator)

*(Continued on Next Page)*

**7. Rationale for choosing BMP and setting measurable goal(s):**

The E-Recycling program has been in place for a number of years in Newnan and serves as a valuable tool for reducing the amount of unused electronics in the community as well as providing an effective means of encouraging recycling of electronics. Electronics typically contain a number of metals that could contaminate water if dumped near streams and rivers. As such, providing this service to the Community, the City believes that providing opportunities for residents to properly dispose of these materials will encourage the public to participate in keeping these pollutants out of the water.

**8. 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 measuring the amount of electronics removed from the community, the amount of pollution / debris that could have potentially entered the City's streams and rivers can be determined. For the purposes of this SWMP, the BMP will be deemed effective if the City continues the program with two collection events and reports the amount of electronics collected per year in each annual report.

## **Best Management Practice (BMP) #B4 – Pet Waste Program**

**1. Target Audience:** General Public

**2. Description of BMP:**

The Pet Waste Collection Program is an ongoing program in Newnan administered by the Keep Newnan Beautiful program. The purpose of the program is to provide bags for the collection of pet waste in City parks. Each year, the City will maintain pet waste stations in all “pet friendly” City parks such that pet owners have access to bags to properly collect and dispose of the pet’s waste. The station will consist of a dispenser type box in a well-marked location containing biodegradable bags for free use of all pet owners. Once the wastes have been collected into the provided bags, the bags are placed in the nearest trash receptacle.

The City’s current “Pet Friendly” Parks are Greenville Street Park, First Avenue Park, Temple Avenue Park, and Cranford Park. The City’s Parks considered “non-pet-friendly” are Lynch Park, CJ Smith Park, Ray Park, and Westgate Park. The “non-pet-friendly” parks are typically where youth activities and sports are played. The City will also reach out to subdivision home owners associations to try to get stations set up in “Open Space”, “Green Space”, and any other locations where pets are typically walked. The subdivision pet stations may be maintained by the HOA and/or maintenance groups, as they are Private, not on City of Newnan property. Please see Appendix S for a separate list of “Pet Friendly” and “Non-Pet Friendly” City Parks.

**3. Measurable Goal(s):**

- The City will maintain at least one pet waste station in all “pet friendly” City Parks.
- The City will report the number bags distributed each year.

**4. Documentation to be Submitted with each annual report:**

- Report of number of pet waste stations in City Parks during permit year
- Report of number of pet waste bags distributed during permit year

**5. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable):
  - 2013
- c. Frequency of Actions (if applicable):
  - On-going
- d. Month / Year of Each Action (if applicable):
  - On-going

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

Carol Duffey (Keep Newnan Beautiful Coordinator)

**7. Rationale for choosing BMP and setting measurable goal(s):**

Given that pet waste can be a contributor to fecal coliform bacteria contamination in streams and rivers, the City believes that encouraging the proper disposal of pet wastes can help reduce fecal coliform bacteria in receiving waters. The City has an active program of installing and maintaining pet waste stations to promote proper disposal of pet wastes as part of the City's Keep Newnan Beautiful Program. While the City does not have a means of tracking the pounds of pet wastes disposed of, the City can track the number of bags distributed through its stations.

**8. How you will determine whether this BMP is effective in reducing pollution to stormwater in accordance with Part 5.1.4 of the Permit:**

For the purposes of this SWMP, the BMP will be deemed effective if the City continues the program to distribute pet waste bags in all of the City's pet friendly parks and reports the number of bags distributed each year in the annual report.

## Illicit Discharge Detection and Elimination (IDDE)

**Permit Requirement:** The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges (as defined in 40 CFR Part 122.26(b)(2)) into its MS4. The permittee must:

- Develop, if not already completed, a storm sewer map, showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls;
- Prohibit through ordinance, or other regulatory mechanisms, non-storm water discharges into the MS4 and implement appropriate enforcement procedures and actions;
- Develop and implement a plan to detect and address non-storm water discharges including illegal dumping to the MS4;
- Inform public employees, businesses, and the general public of the hazards associated with illegal discharges and improper disposal of wastes; and
- Address the following categories of non-stormwater discharges or flows only if they are identified as significant contributors of pollutants to the MS4:
  - Water line flushing
  - Landscape irrigation
  - Diverted stream flows;
  - Rising ground waters
  - Uncontaminated ground water infiltration (as defined in 40 CF Part 35.2005(20));
  - Uncontaminated pumped ground water;
  - Discharges from potable water sources;
  - Foundation drains;
  - Air conditioning condensation;
  - Irrigation water;
  - Springs;
  - Water from crawl space pumps;
  - Footing drains;
  - Lawn watering;
  - Individual residential car washing;
  - Flows from riparian habitats and wetlands;
  - Swimming pool discharges;
  - Street wash water; and
  - Flows from firefighting activities.

**Response:** The City of Newnan has developed a program for identifying and eliminating illicit discharges through the use of structural and non-structural Best Management Practices (BMPs).

## **Best Management Practice (BMP) #C1 – Legal Authority**

### **1. Description of BMP:**

The City of Newnan will maintain an illicit discharge prohibition ordinance within the City of Newnan Code of Ordinances meeting the requirements of the NPDES Phase II MS4 permit as well as the requirements of the Metropolitan North Georgia Water Planning District. If the requirements of the aforementioned programs conflict, the more stringent requirement will be maintained. Please note that the ordinance was adopted in a previous permit year and a copy of the ordinance can be found in Appendix C.

### **2. Measurable Goal(s):**

The City will maintain an illicit discharge prohibition ordinance within the City of Newnan Code of Ordinances at all times during the course of the permit. Each year, the City will evaluate the ordinance to determine if revisions are required. If revisions are required, the City will submit a copy of the revised ordinance to EPD to be included in the SWMP.

### **3. Documentation to be Submitted with each annual report:**

- Memo stating no revisions to ordinance are required or a copy of the revised ordinance if modified.

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): N/A
- c. Frequency of Actions (if applicable):
  - Annual Review of Illicit Discharge Prohibition Ordinance
- d. Month / Year of Each Action (if applicable):
  - December 2013 – Annual Review of Illicit Discharge Prohibition Ordinance
  - December 2014 – Annual Review of Illicit Discharge Prohibition Ordinance
  - December 2015 – Annual Review of Illicit Discharge Prohibition Ordinance
  - December 2016 – Annual Review of Illicit Discharge Prohibition Ordinance
  - December 2017 – Annual Review of Illicit Discharge Prohibition Ordinance

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Michael Klahr, P.E. (City Engineer)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

Maintenance of the legal authority to investigate illicit discharges is required under the permit and provides a means of eliminating illicit discharges to Waters of the State.

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**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 ability to cease discharges of pollutants from non-exempt illicit dry weather discharges is critical to reducing the pollutant loading of local streams and water bodies. As such, this BMP will be determined to be effective if the City maintains an illicit discharge prohibition ordinance throughout the duration of this permit. Additionally, the City will evaluate the ordinance once per year and revise the ordinance if deemed ineffective.

## **Best Management Practice (BMP) #C2 – MS4 Outfall Map and Inventory**

### **1. Description of BMP:**

The City of Newnan has created a map and inventory of all regulated outfalls in the City. Each year, the City will update the map and inventory to reflect the addition of outfalls from new infrastructure projects or developments. Additionally, the City will also remove outfalls that have been reclassified or removed. A copy of the City's MS4 Outfall Map and Inventory List has been included in Appendix D.

### **2. Measurable Goal(s):**

The City will maintain a map and inventory of all MS4 outfalls within the city limits of Newnan and provide a copy of the map and inventory as part of the City's annual report due on February 15<sup>th</sup> of each year the permit is in effect.

### **3. Documentation to be Submitted with each annual report:**

- Updated MS4 Outfall Map and inventory

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable):
  - Annual
- d. Month / Year of Each Action (if applicable):
  - December 2013 – Update MS4 Outfall Map and Inventory
  - December 2014 – Update MS4 Outfall Map and Inventory
  - December 2015 – Update MS4 Outfall Map and Inventory
  - December 2016 – Update MS4 Outfall Map and Inventory
  - December 2017 – Update MS4 Outfall Map and Inventory

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Rob Hill (Engineering Inspector / Stormwater)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

Awareness of discharge points of the City's MS4 is required under the permit and provides a significant awareness of where pollutants can be discharged to Waters of the State. Maintenance of the map and Inventory is critical to accurately reflect changes to the City's regulated outfalls due to new developments, MS4 infrastructure projects, and other changes to the City's outfalls.

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**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:**

Determining where outfalls discharge is critical to preventing illicit discharges to Waters of the State and is a key component of screening (to be addressed in a separate BMP). Through knowledge of the system, the City believes that illicit discharges can be more effectively identified and addressed. This BMP will be determined to be effective if the City maintains an updated map and Inventory of all known MS4 outfalls on an annual basis as demonstrated through submittal of a new map each year in the annual report due on or before February 15<sup>th</sup> documenting the previous year's activities.

## **Best Management Practice (BMP) #C3 – Dry Weather Screening Program**

### **1. Description of BMP:**

The City of Newnan dry weather screening program consists of inspecting outfalls and sampling any dry weather flow to determine if upstream facilities/connections are discharging non-stormwater flows to the drainage system. The City will utilize approved EPD procedures to conduct dry weather screening of approximately 20% of the City annually. If there is dry weather flow, and if the detected limits of any of the sampling parameters are above their acceptable baseline limits, the City will initiate a source tracing and removal program. Please note that the City will be screened on a geographic area basis. The City has been divided into 5 areas and will be screened such that each area will be screened once and the entire regulated area of the City will be screened over the course of the permit. A copy of the City's dry weather screening procedures has been included in Appendix E. A copy of the City's dry weather screening sector area map has been included in Appendix F.

If an outfall is added to the City during the course of a permit year through a new infrastructure project or development project, the outfall will be screened in that year if:

- The outfall is located in the sector to be screened in that year
- Or the outfall is located in a previously screened sector

Please note that outfalls added to the City after the dry weather screening for that year has been completed, will be dry weather screened the following year if located in a previously screened area.

City outfalls that are found to have a dry weather flow regardless of their sector will be screened that year and appropriate action taken as outlined in the approved dry weather screening procedures and Enforcement Response Plan to remove the dry weather flow unless exempt under the provisions of the Illicit Discharge Ordinance.

### **2. Measurable Goal(s):**

Provide a map and completed dry weather screening forms for all dry weather screened outfalls completed within the permit year in each year's annual report.

### **3. Documentation to be Submitted with each annual report:**

- Map of all MS4 outfalls screened in that year
- Completed Dry Weather Screening Forms for all outfalls screened in that year

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**4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable):
  - Annual
- d. Month / Year of Each Action (if applicable):
  - October 2013 – Dry Weather Screen Sector 1
  - October 2014 – Dry Weather Screen Sector 2
  - October 2015 – Dry Weather Screen Sector 3
  - October 2016 – Dry Weather Screen Sector 4
  - October 2017 – Dry Weather Screen Sector 5

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

Rob Hill (Engineering Inspector / Stormwater)

**6. Rationale for choosing BMP and setting measurable goal(s):**

Dry Weather Screening is required under the permit and provides a means of determining if connections to the MS4 are discharging pollutants to the City's streams and rivers. A geographic approach to dry weather screening over 5 years ensures that outfalls are screened in an efficient manner limiting the possibility that an outfall could be missed.

**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 City believes that identifying and eliminating illicit discharges of pollutants will reduce the pollutant loading of the City's streams and rivers. This BMP will be determined to be effective if the City screens one sector of the City per year such that over the course of the permit every MS4 outfall is inspected a minimum of once.

## **Best Management Practice (BMP) #C4 – Dry Weather Discharge Source Tracing and Removal Procedures**

### **1. Description of BMP:**

Once an illicit discharge is detected through the dry weather screening program or via a complaint, it will be the responsibility of the City to attempt to trace the source and remove the illicit connection. A copy of the City's Dry Weather Discharge Source Tracing and Removal Procedures can be found in Appendix E.

### **2. Measurable Goal(s):**

- 100% of suspected illicit discharges investigated and removed unless exempt
- 100% of identified illicit connections removed
- All investigations will be documented in each year's annual report

### **3. Documentation to be Submitted with each annual report:**

- Summary report of all suspected illicit discharges and corrective actions taken if non-exempt

### **4. Schedule:**

- Interim Milestone Dates (if applicable): N/A
- Implementation Date (if applicable): January 2013
- Frequency of Actions (if applicable):
  - On-going
- Month / Year of Each Action (if applicable):
  - On-going

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Rob Hill (Engineering Inspector / Stormwater)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

Illicit discharge source tracing and removal is required under the permit and provides a means of eliminating pollutant discharges to the City's streams and rivers. As required under the permit, all discharges will be investigated and appropriate action taken as outlined in the City's Illicit Discharge Ordinance and Enforcement Response Plan.

### **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 City believes that identifying and eliminating illicit discharges of pollutants will reduce the pollutant loading of the City's streams and rivers. This BMP will be determined to be effective if the City source traces and takes corrective action for all identified non-exempt dry weather flows.

## **Best Management Practice (BMP) #C5 – Business Brochures**

### **1. Description of BMP:**

The City of Newnan annually mails a brochure to restaurants, institutions, hospitals, industries, and automotive service establishments in the City. The brochure is a notice explaining the problems associated with improper disposal of waste as it relates to these particular establishments. The brochure, which may change from year-to-year, is educational in nature by providing tips on proper disposal.

The City of Newnan educates the Public about the hazards of illicit discharge in BMP #A3 (PSA), BMP #A4 (Facebook Page), and BMP #A1 (School Education). The City educates Government Employees in BMP #F5 (Employee Training).

### **2. Measurable Goal(s):**

It is the goal of the City of Newnan to mail 50 brochures a year to restaurants, institutions, hospitals, industries, and automotive service establishments in the City. Each year, the City will submit as part of the annual report, a list of businesses (with addresses) which received a brochure along with an example of the brochure.

### **3. Documentation to be Submitted with each annual report:**

- Example of brochure mailed to businesses
- List of businesses which received the brochure in that permit year

### **4. Schedule:**

#### a. Interim Milestone Dates (if applicable):

- Develop a list of businesses to receive the brochure by July of each permit year
- Develop the brochure by August of each permit year
- Print the brochures by August of each permit year

#### b. Implementation Date (if applicable): January 2013

#### c. Frequency of Actions (if applicable):

- Annual

#### d. Month / Year of Each Action (if applicable):

- September 2013 – Mail 50 brochures
- September 2014 – Mail 50 brochures
- September 2015 – Mail 50 brochures
- September 2016 – Mail 50 brochures
- September 2017 – Mail 50 brochures

*(Continued on Next Page)*

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

Tracy Dunnavant (Planning Director)

6. **Rationale for choosing BMP and setting measurable goal(s):**

The brochure will target business types that have a history of improper disposal of waste. The brochure will educate the businesses of the value of proper disposal and possible implications of illegal disposal.

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:**

Although not a direct indicator of water quality in the streams and rivers of the City, it is believed that education will have an intangible benefit on water quality through avoidance of illicit discharges. For the purposes of this SWMP, this BMP will be deemed to be effective if the City mails at least fifty (50) brochures to businesses with a higher potential for pollutant discharges.

## **Best Management Practice (BMP) #C6 – Environmental Concern Response**

### **1. Description of BMP:**

The City published an “environmental concern hot-line” for citizens to report illegal dumping, soil erosion problems, sewer spills, clogged storm drains, etc. The hot-line number has been placed on the City’s web site, advertised on the local access channel, and published in the local phone book. Additionally, the City is working with a website called “See Click Fix” which assists with complaints as well. For an example, see [www.seeclickfix.com](http://www.seeclickfix.com) and enter Newnan, GA for examples of complaints received by the City and their status. All illicit discharge complaints received will be documented and inspected within 3 days. The results of the inspections will also be documented.

### **2. Measurable Goal(s):**

It is the goal of the City of Newnan to respond to all complaints received from the environmental concern hot-line within 3 business days. The results of all follow-up inspections will be documented. Each year, the City will provide a list of all complaints received related to illicit discharges and document the date received, date investigated, as well as the results of the investigation / actions taken to resolve the issue.

### **3. Documentation to be Submitted with each annual report:**

- Summary of complaints / concerns related to stormwater management issues and correction action taken for each if warranted.

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): On-going
- c. Frequency of Actions (if applicable): On-going
- d. Month / Year of Each Action (if applicable): On-going

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Rob Hill (Engineering Inspector / Stormwater)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

The hot-line provides a simple and readily available way for citizens to report any environmental issues they see. The advertisement of the hot-line made people aware of environmental concerns and expanded the City’s ability to “see all places at all times”.

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**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:**

This BMP will be deemed to be effective if all complaints received by the City are investigated in a timely manner and appropriate action is taken to resolve the issue.

## Construction Site Stormwater Runoff Control

**Permit Requirement:** The permittee must develop, implement and enforce a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Stormwater discharges from construction activity disturbing less than one acre must be included in the permittee's program if the construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The permittee must develop and implement a construction site stormwater runoff control program that contains the following elements:

- An ordinance or other regulatory mechanism to require erosion and sediment (E&S) controls, as well as sanctions to ensure compliance, to the extent allowable, under State or local law;
- Requirements for construction site operators to implement E&S control best management practices;
- Requirements for construction site operators to control waste such as discharged building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse water quality impacts;
- Procedures for site plan review that incorporate consideration of potential water quality impacts;
- Procedures for receipt and consideration of information submitted by the public; and
- Procedures for site inspection and enforcement of control measures.

**Response:** The City of Newnan is currently operating as its own Local Issuing Authority (LIA). Newnan has entered into a Memorandum of Agreement (MOA) to receive, review, and approve plans for the issuance of a Land Disturbance Permit (LDP) under the Georgia Erosion and Sediment Control Act (GESA). Compliance with the requirements outlined in the NPDES Phase II permit will utilize many of the same activities required under GESA.

## **Best Management Practice (BMP) #D1 – Legal Authority**

### **1. Description of BMP:**

The City of Newnan will maintain an erosion and sediment control ordinance within the City of Newnan Code of Ordinances meeting the requirements of the NPDES Phase II MS4 permit as well as the requirements of the Georgia Erosion & Sedimentation Act (GESA). If the requirements of the aforementioned programs conflict, the more stringent requirement will be maintained. Please note that the ordinance was adopted in a previous permit year and a copy of the ordinance can be found in Appendix G.

### **2. Measurable Goal(s):**

The City will maintain an erosion and sediment control ordinance within the City of Newnan Code of Ordinances at all times during the course of the permit. Each year, the City will evaluate the ordinance to determine if revisions are required. If revisions are required, the City will submit a copy of the revised ordinance to EPD to be included in the SWMP.

### **3. Documentation to be Submitted with each annual report:**

- Memo stating no revisions to ordinance are required or a copy of the revised ordinance if modified.

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): N/A
- c. Frequency of Actions (if applicable):
  - Annual Review of Erosion & Sediment Control Ordinance
- d. Month / Year of Each Action (if applicable):
  - December 2013 – Annual Review of Erosion & Sediment Control Ordinance
  - December 2014 – Annual Review of Erosion & Sediment Control Ordinance
  - December 2015 – Annual Review of Erosion & Sediment Control Ordinance
  - December 2016 – Annual Review of Erosion & Sediment Control Ordinance
  - December 2017 – Annual Review of Erosion & Sediment Control Ordinance

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Michael Klahr, P.E. (City Engineer)

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**6. Rationale for choosing BMP and setting measurable goal(s):**

Maintenance of the legal authority to require erosion and sediment control measures is required under the permit and provides a means of reducing the potential for erosion and sedimentation impacts to 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 ability to require construction site operators to design, implement and maintain erosion and sedimentation controls on active construction sites is critical to protecting local streams and water bodies. As such, this BMP will be determined to be effective if the City maintains an erosion and sediment control ordinance throughout the duration of this permit. Additionally, the City will evaluate the ordinance once per year and revise the ordinance if deemed ineffective.

## **Best Management Practice (BMP) #D2 – Site Plan Review**

### **1. Description of BMP:**

The City of Newnan is its own Issuing Authority, and remains in compliance with Georgia Erosion and Sediment Control Act (GESA) of 1975 as amended. Accordingly, all developers are required to comply with the local E&S Ordinance and obtain a land disturbance permit prior to the start of any land disturbing activities that will disturb one (1.0) or more acres of land within the City Limits.

ESPCP plans submitted to the City are reviewed by a Newnan staff member who has received the State sponsored E&S training. Newnan has entered into a Memorandum of Agreement with the National Resources Conservation District to review and approve its own ESPCPs. Plans must meet the requirements of GESA and the Newnan E&S Ordinance, which includes the requirement to control turbidity in the site runoff, control impacts on receiving streams and the implementation of the minimum control measures. City staff also reviews the site plan to ensure that the stormwater management plan meets requirements for water quality and water quantity treatment as described in the Stormwater Ordinance. City staff will work with a developer to improve a plan until it meets all applicable requirements. Once a plan is approved by Newnan, the developer is issued a Land Disturbing Activities Permit and can commence with land disturbing activities.

Newnan's E&S Ordinance requires that local developers pay permit fees of \$40.00 per disturbed acre to the City. Since GESA contains requirements for these fees to be paid, Newnan is notifying developers of this requirement and collecting the associated fees.

Please see Appendix R for the Plan Review Checklists the City uses for plan review of construction plans.

### **2. Measurable Goal(s):**

- Review 100% of ESPCPs for compliance with GESA and the Newnan E&S Ordinance and grant Land Disturbance Permit only after ESPCP is approved
- Provide a list of site plans received and the number of site plans reviewed, approved, or denied during the reporting period in each annual report

### **3. Documentation to be Submitted with each annual report:**

- Summary of ESPCPs reviewed during permit year and action taken for each review

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013

*(Continued on Next Page)*

- c. Frequency of Actions (if applicable): On-going
- d. Month / Year of Each Action (if applicable): On-going

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

Dana McCauley (Civil Engineer)

**6. Rationale for choosing BMP and setting measurable goal(s):**

Construction sites have been shown to be a leading contributor of silting state waters. Therefore, planning for erosion and sediment control practices and procedures in advance of starting construction is an important step in preventing sedimentation from entering receiving waters. Plan Review is the initial enforcement tool for insuring compliance with City and State standards.

**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:**

It is the intent of this BMP to protect existing water quality. By ensuring that no land disturbing projects are authorized without first developing a plan to meet the requirements of GESA and the local E&S ordinance, the City believes that this BMP will provide a significant safeguard against potential water quality impacts. For the purposes of this SWMP, this BMP will be deemed effective if no land disturbance permits are issued without first meeting the requirements of the City's E&S ordinance through the design of site specific structural and non-structure best management practices.

## **Best Management Practice (BMP) #D3 – E&S Inspection Program**

### **1. Description of BMP:**

The City of Newnan currently inspects all active construction projects within the City that maintain Land Disturbance Permits. Sites are inspected for compliance with their approved ESPCP plan. All construction sites are inspected shortly after land disturbing activities have commenced to ensure that all E&S BMPs are in place. Regular inspections will take place after that based on the following priorities:

- Evidence of erosion or sediment leaving the site
- History of non-compliance with ESPCP plan and E&S regulations
- Citizen complaints
- Proximity to local waterways

Throughout the length of the project, the E&S certified person responsible for the ESPCP implementation onsite is responsible for coordinating status of that implementation. All construction sites are inspected after construction activity has ceased to ensure that the site has been properly stabilized. An example of the inspection form utilized by City staff has been included in the SWMP as Appendix H. A log is maintained by Newnan of all E&S inspection records.

During inspections, City staff will check for compliance with the approved ESPCP, the City's Erosion & Sedimentation Ordinance, and with the illicit discharge provisions of the Stormwater Ordinance. Staff will ensure that BMP's are in place to control discarded building materials, concrete truck washout, chemical storage, litter, sanitary waste, and other items that could cause adverse impacts to water quality.

### **2. Measurable Goal(s):**

- It is the goal of the City of Newnan to perform a site preparation inspection of all sites greater than 1 acre and inspect land disturbing activities for all sites greater than 1 acre at least 1 time every 2 weeks. In addition, all land disturbing sites with an outstanding correction notice or repeated history of non-compliance will be inspected within 72 hours of a 1" rain event.

### **3. Documentation to be Submitted with each annual report:**

- Summary list of all inspections taken
- Representative sample of inspection sheets filled out on all inspections

*(Continued on Next Page)*

**4. Schedule:**

- a. Interim Milestone Dates (if applicable): On-going
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable):
  - All sites will be inspected for installation of erosion control measures and will be inspected for land disturbing activities at least 1 time every 2 weeks. Problem sites will be inspected within 72 hours after a 1 inch rain event.
- d. Month / Year of Each Action (if applicable): On-going

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

Dana McCauley (Civil Engineer)

**6. Rationale for choosing BMP and setting measurable goal(s):**

Construction sites have been shown to be a leading contributor of silting state waters and adversely impacting water quality. After site planning, proper enforcement is critical for compliance with approved plans and state and local regulations. The inspection program is also critical for proper contractor and public educational efforts.

**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:**

It is the intent of this BMP to protect existing water quality. By ensuring that land disturbing projects are inspected regularly to confirm compliance the requirements of GESA, the local E&S ordinance, and the site E&S plans, the City believes that this BMP will provide a significant safeguard against potential water quality impacts. For the purposes of this SWMP, this BMP will be deemed effective if construction sites are inspected at least once every 2 weeks to ensure that the sites are meeting the requirements of the City's E&S ordinance and site specific erosion, sedimentation and pollution control plan.

## **Best Management Practice (BMP) #D4 – E&S Enforcement Procedures**

### **1. Description of BMP:**

If upon inspection, a site is found to be in non-compliance, the Land Disturbance Permit holder will be notified. The contractor is provided with a copy of the inspection report and will be given a timeline for compliance (not to exceed five days). City E&S inspectors then re-inspect the site to ensure that the appropriate measures have been implemented. Following the third and each subsequent violation, an immediate stop-work order shall be issued. No work shall be allowed on the site except to address those deficiencies identified in the inspection and subsequent re-inspections.

Stop work orders shall be issued immediately without prior warnings if any of the following are identified on a site:

- Regulated land disturbing activities are being undertaken without a Land Disturbance Permit
- Failure to maintain a stream buffer
- Significant amounts of sediment as determined by the local issuing authority or by the director or his or her designee, have been or are being discharged into state waters and where best management practices have not been properly designed, installed, and maintained

For a more detailed description of enforcement procedures regarding E&S violations, the reader is directed to the Erosion and Sediment Control ordinance in Appendix G as well as the Enforcement Response Plan following approval in Appendix P.

### **2. Measurable Goal(s):**

- Follow enforcement procedures outlined in the City's E&S ordinance and ERP.
- Provide a log of all violations and enforcement procedures undertaken during the reporting period in each annual report including the number and type (e.g. Notice of Violation, Stop Work Order) and status (e.g. pending, resolved).

### **3. Documentation to be Submitted with each annual report:**

- Log of all violations and enforcement procedures undertaken during the reporting period

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable): On-going
- d. Month / Year of Each Action (if applicable): On-going

*(Continued on Next Page)*

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

Dana McCauley (Civil Engineer)

**6. Rationale for choosing BMP and setting measurable goal(s):**

As a local issuing authority, the City is required to implement this BMP under GESA as well as the permit.

**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:**

It is the intent of this BMP to protect existing water quality. By ensuring that land disturbing projects conform to the requirements of GESA, the local E&S ordinance, and the site E&S plans, the City believes that this BMP will provide a significant safeguard against potential water quality impacts. For the purposes of this SWMP, this BMP will be deemed effective if construction sites are meeting the requirements of the City's E&S ordinance and site specific erosion, sedimentation and pollution control plan. Sites found not to be in compliance will be cited (either verbally or in writing) and appropriate actions taken. A copy of the enforcement procedures implemented each permit year will be included in the annual report.

## **Best Management Practice (BMP) #D5 – Environmental Concern Hot-Line**

### **1. Description of BMP:**

The City published an “environmental concern hot-line” for citizens to report illegal dumping, soil erosion problems, sewer spills, clogged storm drains, etc. The hot-line number has been placed on the City’s web site, advertised on the local access channel, and published in the local phone book. Additionally, the City is working with a website called “See Click Fix” which assists with complaints as well. For an example, see [www.seeclickfix.com](http://www.seeclickfix.com) and enter Newnan, GA for examples of complaints received by the City and their status. All illicit discharge complaints received will be documented and inspected within 3 days. The results of the inspections will also be documented.

### **2. Measurable Goal(s):**

It is the goal of the City of Newnan to respond to all complaints received from the environmental concern hot-line within 3 business days. The results of all follow-up inspections will be documented. Each year, the City will provide a list of all complaints received related to illicit discharges and document the date received, date investigated, as well as the results of the investigation / actions taken to resolve the issue.

### **3. Documentation to be Submitted with each annual report:**

- Summary of complaints / concerns related to stormwater management issues and correction action taken for each if warranted.

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): On-going
- c. Frequency of Actions (if applicable): On-going
- d. Month / Year of Each Action (if applicable): On-going

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Rob Hill (Engineering Inspector / Stormwater)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

The hot-line provides a simple and readily available way for citizens to report any environmental issues they see. The advertisement of the hot-line made people aware of environmental concerns and expanded the City’s ability to “see all places at all times”.

*(Continued on Next Page)*

**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:**

This BMP will be deemed to be effective if all complaints received by the City are investigated in a timely manner and appropriate action is taken to resolve the issue.

## **Best Management Practice (BMP) #D6 – E&S Certification**

### **1. Description of BMP:**

GESA, as amended, requires that all construction site operators and all local government staff involved with E&S inspections or ECPCP review receive training from the GWSCC on proper E&S control. The City of Newnan will require that all its E&S inspectors receive this training.

### **2. Measurable Goal(s):**

- Ensure that all MS4 staff involved in construction activities subject to the Construction General Permits (GCPs) are trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission.
- Provide the number and type of current certifications held by MS4 staff in each annual report.

### **3. Documentation to be Submitted with each annual report:**

- Summary of the number and type of current certifications held by MS4 staff

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable): On-going
- d. Month / Year of Each Action (if applicable): On-going

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Dana McCauley (Civil Engineer)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

As a local issuing authority, the City is required to implement this BMP under GESA as well as the permit.

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**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:**

It is the intent of this BMP to protect existing water quality. By ensuring that construction inspectors / operators are properly trained in E&S requirements, the City believes that this BMP will provide a significant safeguard against potential water quality impacts. For the purposes of this SWMP, this BMP will be deemed effective if City staff involved in land disturbing activities or approval of land disturbance permits maintain current certification with the GSWCC. A copy of the certification cards for City staff will be submitted with each annual report.

## Post-Construction Stormwater Management in New Development and Redevelopment

**Permit Requirement:** The permittee must develop, implement and enforce a program to address stormwater 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. The program must ensure that controls are in place that will prevent or minimize water quality impacts. At a minimum, the Post-Construction Stormwater Management in New Development and Redevelopment Program must contain the following requirements:

- Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;
- 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; and
- Ensure adequate long-term operation and maintenance of the BMPs.

**Response:** The City of Newnan has developed several Best Management Practices (BMPs) to address the permit conditions as well as ensure long-term mitigation of the impacts from development activities. The following pages outline each BMP and the goals / implementation schedules applicable to each activity.

### Stormwater Design Manual

As part of the City's Post Construction Stormwater Management ordinance, the City adopted the Georgia Stormwater Management Manual (GSMM). The GSMM was adopted by City Council on March 22, 2005.

### Green Infrastructure / Low Impact Development (GI / LID)

As part of this SWMP, the City will review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impede the use of GI / LID practices, including infiltration, reuse, and evapotranspiration. In order to determine if modifications are required, the City will utilize the Code & Ordinance Worksheet evaluation tool developed by the Center for Watershed Protection to evaluate the City's various codes, ordinances, and other regulations. The review will be completed within the first two years of the effective date of the permit and a summary of the review will be included in the 2014 annual report submitted no later than February 15, 2015. If revisions are determined to be warranted as a result of the evaluation, all changes will be completed within four years of the effective date of the permit and submitted to EPD as part of the 2016 annual report submitted no later than February 15, 2017. Once approved by EPD the review will be included in the SWMP in Appendix O

## **Best Management Practice (BMP) #E1 – Legal Authority**

### **1. Description of BMP:**

The City of Newnan will maintain a post construction stormwater runoff control ordinance within the City of Newnan Code of Ordinances meeting the requirements of the NPDES Phase II MS4 permit as well as the requirements of the Metropolitan North Georgia Water Planning District. If the requirements of the aforementioned programs conflict, the more stringent requirement will be maintained. Please note that the ordinance was adopted in a previous permit year and a copy of the ordinance can be found in Appendix I.

### **2. Measurable Goal(s):**

The City will maintain a post construction stormwater runoff control ordinance within the Code of Ordinances at all times during the course of the permit. Each year, the City will evaluate the ordinance to determine if revisions are required. If revisions are required, the City will submit a copy of the revised ordinance to EPD to be included in the SWMP.

### **3. Documentation to be Submitted with each annual report:**

- Memo stating no revisions to ordinance are required or a copy of the revised ordinance if modified.

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): N/A
- c. Frequency of Actions (if applicable):
  - Annual Review of Erosion & Sediment Control Ordinance
- d. Month / Year of Each Action (if applicable):
  - December 2013 – Annual Review of Post Construction Stormwater Runoff Control Ordinance
  - December 2014 – Annual Review of Post Construction Stormwater Runoff Control Ordinance
  - December 2015 – Annual Review of Post Construction Stormwater Runoff Control Ordinance
  - December 2016 – Annual Review of Post Construction Stormwater Runoff Control Ordinance
  - December 2017 – Annual Review of Post Construction Stormwater Runoff Control Ordinance

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Michael Klahr, P.E. (City Engineer)

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**6. Rationale for choosing BMP and setting measurable goal(s):**

Maintenance of the legal authority to require post construction stormwater runoff control measures is required under the permit and provides a means of reducing the potential for water quality impacts from land development projects.

**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 ability to require the design, construction and maintenance of best management practices to offset the impacts of development projects is critical to protecting local streams and water bodies. As such, this BMP will be determined to be effective if the City maintains a post construction stormwater runoff control ordinance throughout the duration of this permit. Additionally, the City will evaluate the ordinance once per year and revise the ordinance if deemed ineffective.

## **Best Management Practice (BMP) #E2 – Post-Construction Stormwater Management Structure Inventory**

### **1. Description of BMP:**

The City of Newnan will develop an inventory list of all publicly-owned post-construction stormwater management structures (e.g. detention / retention ponds, water quality vaults, infiltration structures) and those privately-owned structures designed after December 9, 2008 within the City Limits of Newnan. The inventory list shall be in a table format. The inventory list shall include information on the number and type of structures, address or coordinate, ownership (i.e. publicly-owned, privately-owned) and other descriptive attributes of each post-construction structure.

Following development of the initial inventory, the City will update the inventory list as new structures are completed or existing structures are identified.

### **2. Measurable Goal(s):**

- Develop an inventory list of all publicly-owned post-construction stormwater management structures and privately-owned structures designed after December 9, 2008
- Update the aforementioned inventory list each year and include it in each annual report

### **3. Documentation to be Submitted with each annual report:**

- Inventory List of Post Construction Stormwater Management Structures

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable): Annual
- d. Month / Year of Each Action (if applicable): On-going
  - December 2013 – Complete the initial inventory list
  - December 2014 – Update the inventory list with new structures or existing structures identified in that year
  - December 2015 – Update the inventory list with new structures or existing structures identified in that year
  - December 2016 – Update the inventory list with new structures or existing structures identified in that year
  - December 2017 – Update the inventory list with new structures or existing structures identified in that year

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

Rob Hill (Engineering Inspector / Stormwater)

**6. Rationale for choosing BMP and setting measurable goal(s):**

Identifying post-construction stormwater management control structures is required under the permit. These structures serve as critical infrastructure in the City's efforts to protect properties downstream of City facilities and private developments from water quality and flooding impacts. By updating the map at least once per year, the City will ensure that the inventory is kept up to date.

**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:**

Maintenance of stormwater management control structures is critical to ensuring long term operation of the structures. As such, identification will assist the City in protecting water quality in streams and rivers from the stormwater impacts of the developments that these structures service. For the purposes of this SWMP, this BMP will be deemed effective if the City can maintain awareness of all recently constructed post construction stormwater management structures via the maintenance of a map and inventory of all City owned structures and private structures designed after December 9, 2008. A copy of the updated map will be provided with the annual report each year.

## **Best Management Practice (BMP) #E3 – Post-Construction Stormwater Management Structure Inspection**

### **1. Description of BMP:**

The City of Newnan will inspect approximately 25% of the structures identified in the Post-Construction Stormwater Management Structure Inventory BMP (see BMP #E2) per year. The inspection program will be implemented such that over the course of the permit period all structures will be inspected at least once. A copy of the inspection form to be utilized in the inspection program has been included in Appendix J.

### **2. Measurable Goal(s):**

- Inspect approximately 25% of the City's (both public and private) Post Construction Stormwater Management Structures per year
- Inspect 100% of the City's Post Construction Stormwater Management Structures over the course of the permit
- Include a copy of the form for inspections performed in each Annual Report

### **3. Documentation to be Submitted with each annual report:**

- Completed Inspection Forms (2014-2017 Permit Years Only)

### **4. Schedule:**

- Interim Milestone Dates (if applicable): N/A
- Implementation Date (if applicable): January 2013
- Frequency of Actions (if applicable): Annual
- Month / Year of Each Action (if applicable): On-going
  - October 2014 – Inspect approximately 25% of the City's Post Construction Stormwater Management Structures
  - October 2015 – Inspect approximately 25% of the City's Post Construction Stormwater Management Structures
  - October 2016 – Inspect approximately 25% of the City's Post Construction Stormwater Management Structures
  - October 2017 – Inspect approximately 25% of the City's Post Construction Stormwater Management Structures

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Rob Hill (Engineering Inspector / Stormwater)

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**6. Rationale for choosing BMP and setting measurable goal(s):**

Inspecting post-construction stormwater management control structures is required under the permit. These structures serve as critical infrastructure in the City's efforts to protect properties downstream of City facilities and private developments from water quality and flooding impacts. By inspecting each facility at least once every 5 years, the City will ensure that the maintenance needs of the structures are identified.

**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:**

Maintenance of stormwater management control structures is critical to ensuring long term operation of the structures. As such, inspection will assist the City in protecting water quality in streams and rivers from the stormwater impacts of the developments that these structures service. For the purposes of this SWMP, this BMP will be deemed effective if the City can inspect every post construction stormwater management facility identified in BMP E2 within the 5 years of this permit. It is anticipated that the City will inspected approximately twenty-five percent (25%) of the structures per year starting in 2014. Documentation of the inspections will be included in each year's annual report for those years in which inspections were conducted.

## **Best Management Practice (BMP) #E4 – Post-Construction Stormwater Management Structure Maintenance**

### **1. Description of BMP:**

The City of Newnan will maintain all of the publicly owned post-construction stormwater management control structures identified in the Post-Construction Stormwater Management Structure Inventory (see BMP #E2). Generally, maintenance will consist of vegetation maintenance (i.e. mowing, removal of invasive species, etc.) as appropriate as well as litter and trash removal. If structural deficiencies are identified in a structure, then a work order will be generated and maintenance scheduled. If the scope of the work is such that the work cannot be completed in a short period of time, then the project will be added to the City's capital improvements projects list.

Private structures will be maintained by the owner / operators of the site. A maintenance agreement will be referred to for the means by which a facility will be maintained. The City will retain copies of the maintenance agreements for all new structures completed after the effective date of the permit. A summary list of the maintenance agreements will be included in each annual report. If a deficiency is noted during an inspection, then the City will notify the owner / operator of the results of the inspection and suggested actions to take.

### **2. Measurable Goal(s):**

- Maintain 100% of the City's Post Construction Stormwater Management Structures over the course of the permit.
  - The City will prepare a summary table outlining maintenance activities undertaken over the course of each permit year and include it in the annual report due for that year.
- The City will include a copy of each maintenance agreement recorded that permit year for all privately maintained ponds within the urbanized area.
- The City will include a copy of a letter recommending maintenance activities for detention ponds inspected that year which are privately maintained if maintenance activities are required.

### **3. Documentation to be Submitted with each annual report:**

- Summary of maintenance activities performed on City-maintained Post Construction Stormwater Management Structures
- Summary of Maintenance Agreements recorded during that permit year for privately maintained Post Construction Stormwater Management Structures

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**4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): October 2013
- c. Frequency of Actions (if applicable): On-going
- d. Month / Year of Each Action (if applicable): On-going

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

Rob Hill (Engineering Inspector / Stormwater)

**6. Rationale for choosing BMP and setting measurable goal(s):**

Maintenance of post-construction stormwater management control structures is required under the permit. These structures serve as critical infrastructure in the City's efforts to protect properties downstream of City facilities and private developments from water quality and flooding 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:**

Maintenance of stormwater management control structures is critical to ensuring long term operation of the structures. As such, maintenance of these facilities will assist the City in protecting water quality in streams and rivers from the stormwater impacts of the developments that these structures service. For the purposes of this SWMP, this BMP will be deemed effective if the City maintains every post construction stormwater management facility identified in BMP E2 owned / maintained by the City of Newnan within the 5 years of this permit. Documentation of maintenance activities performed by the City on City owned ponds will be included in each year's annual report. Additionally, the City will include a summary of the maintenance agreements for those post construction stormwater management control facilities permitted in that year.

## **Best Management Practice (BMP) #E5 – GI/LID Structure Inventory**

### **1. Description of BMP:**

The City of Newnan will develop an inventory of water quality-related Green Infrastructure (GI) / Low Impact Development (LID) structures located within the City Limits of Newnan. This inventory will contain all GI/LID structures constructed after December 6, 2012. The inventory will include at a minimum bioswales, pervious pavements, rain gardens, cisterns, green roofs, and any other structure deemed appropriate by the Stormwater Coordinator. The initial inventory will be reported in a table format that will include the following information:

- Type of Structure
- Location of Structure (Latitude & Longitude)
- Estimated Date of Construction

In addition to the type and location of each structure, the table will also include a summary of the total number of each structure. Following development of the initial inventory, new structures will be identified through the plan development process.

### **2. Measurable Goal(s):**

- Develop an inventory of all GI/LID structures located within the City Limits of Newnan.
- Update the inventory once per year following the initial development of the inventory.

### **3. Documentation to be Submitted with each annual report:**

- Inventory list of all GI/LID structures in the City constructed after December 6, 2012

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): December 31, 2013
- c. Frequency of Actions (if applicable): Annual
- d. Month / Year of Each Action (if applicable):
  - December 2013 – Develop Inventory
  - December 2014 – Update Inventory
  - December 2015 – Update Inventory
  - December 2016 – Update Inventory
  - December 2017 – Update Inventory

*(Continued on Next Page)*

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

Dana McCauley (Civil Engineer)

**6. Rationale for choosing BMP and setting measurable goal(s):**

Development and maintenance of an inventory of GI/LID structures is required under the permit. These structures serve as key means by which developments can protect properties as well as streams and river downstream of City facilities and private developments from water quality and flooding 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:**

It is the intent of this BMP to protect existing water quality. By tracking the construction of these structures as well as ensuring the long term maintenance of these structures through maintenance agreements, the City believes that future impacts from development can be offset to a greater extent than historical development standards. For the purposes of this SWMP, this BMP will be deemed effective if the City maintains an inventory list / database of every Green Infrastructure / Low Impact Development structure constructed in the City since December 9, 2012. Each year, the City will submit of a copy of the inventory list / database with the annual report beginning with the annual report due February 15, 2014.

## **Best Management Practice (BMP) #E6 – GI/LID Ordinance Review**

### **1. Description of BMP:**

The City of Newnan will maintain a Green Infrastructure / Low Impact Development ordinance within the City of Newnan Code of Ordinances and Regulations meeting the requirements of the NPDES Phase II MS4 permit.

### **2. Measurable Goal(s):**

The City will maintain a Green Infrastructure / Low Impact Development ordinance within the City of Newnan Code of Ordinances and Regulations at all times during the course of the permit. Each year, the City will evaluate the ordinance/regulation to determine if revisions are required. If revisions are required, the City will submit a copy of the revised ordinance to EPD to be included in the SWMP.

### **3. Documentation to be Submitted with each annual report:**

- Memo stating no revisions to ordinance/regulation are required or a copy of the revised ordinance/regulation if modified.

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): N/A
- c. Frequency of Actions (if applicable):
  - Annual Review of Erosion & Sediment Control Ordinance
- d. Month / Year of Each Action (if applicable):
  - April 2013 – Annual Review of Green Infrastructure / Low Impact Development ordinance
  - April 2014 – Annual Review of Green Infrastructure / Low Impact Development ordinance
  - April 2015 – Annual Review of Green Infrastructure / Low Impact Development ordinance
  - April 2016 – Annual Review of Green Infrastructure / Low Impact Development ordinance
  - April 2017 – Annual Review of Green Infrastructure / Low Impact Development ordinance

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Michael Klahr, P.E. (City Engineer)

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**6. Rationale for choosing BMP and setting measurable goal(s):**

Maintenance of the legal authority to require and/or allow Green Infrastructure / Low Impact Development measures is required under the permit and provides a means of reducing the potential impacts to 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 ability to require and/or allow construction site operators to design, implement and maintain Green Infrastructure / Low Impact Development on active construction sites is critical to protecting local streams and water bodies. As such, this BMP will be determined to be effective if the City maintains a Green Infrastructure / Low Impact Development ordinance throughout the duration of this permit. Additionally, the City will evaluate the ordinance once per year and revise the ordinance if deemed ineffective.

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

**Permit Requirement:** The permittee must develop and implement an operation and implement an operation and maintenance program that includes a training component with the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Using training materials available from the USEPA or other organizations as guidance, the permittee must, as a part of this program, include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

**Response:** The City of Newnan has developed several Best Management Practices (BMPs) to address the permit conditions as well as ensure long-term mitigation of the impacts from municipal operations. The following pages outline each BMP and the goals / implementation schedules applicable to each activity.

## **Best Management Practice (BMP) #F1 – MS4 Control Structure Inventory & Map**

### **1. Description of BMP:**

The City of Newnan will continue to maintain a GIS based map and inventory of all MS4 components owned or maintained by the City within the City Limits. At a minimum, the inventory and map will include all of the following:

- Collection Structures (i.e. Catch Basins, Drop Inlets, Yard Inlets, etc.)
- Junction Boxes
- Headwalls and other Pipe End Treatments
- Storm Drain Pipes
- Ditches / Swales

As part of the inventory / map, the City will include a summary of the totals for each MS4 component. Each year, the City will update the inventory and map as new structures are added or existing structures are removed. A summary of the total number of structures added / removed each year will be included in the annual report for that permit year.

### **2. Measurable Goal(s):**

- Provide an updated MS4 Control Structure Inventory Map with each annual report

### **3. Documentation to be Submitted with each annual report:**

- Updated MS4 Control Structure Inventory Map

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable): Annual
- d. Month / Year of Each Action (if applicable):
  - December 2013 – Update MS4 Control Structure Inventory & Map
  - December 2014 – Update MS4 Control Structure Inventory & Map
  - December 2015 – Update MS4 Control Structure Inventory & Map
  - December 2016 – Update MS4 Control Structure Inventory & Map
  - December 2017 – Update MS4 Control Structure Inventory & Map

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Rob Hill (Engineering Inspector / Stormwater)

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**6. Rationale for choosing BMP and setting measurable goal(s):**

Development and maintenance of a MS4 Control Structure Inventory & Map is required under the permit. Newnan also utilizes the map / inventory as a critical management tool to addressing infrastructure needs within the Community.

**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:**

It is the intent of this BMP to protect existing water quality by ensuring that City staff is aware of infrastructure for which the City is responsible. This awareness will then aid the City in ensuring the long term maintenance of the system. For the purposes of this SWMP, this BMP will be deemed effective if the City maintains a map / database of every known MS4 control structure owned or maintained by the City. Each year, the City will submit of a copy of the map / database with the annual report beginning with the annual report due February 15, 2014.

## **Best Management Practice (BMP) #F2 – MS4 Inspection Program**

### **1. Description of BMP:**

The City of Newnan will continue to implement a MS4 inspection program. Please note that the City will be screened on a geographic area basis. The City has been divided into 5 areas and will be screened such that each area will be screened once and the entire regulated area of the City will be screened over the course of the permit. A copy of the City's MS4 inspection sector area map has been included in Appendix K. Generally, the MS4 will be inspected for evidence of sedimentation, debris, or structural defects. Each year, the results of inspection will be recorded in a table format and provided in the annual report for that year. An example of the table format has been included in Appendix L.

Please note that MS4 control structures added to the City after the inspections for that year has been completed will be inspected the following year if located in a previously screened area.

### **2. Measurable Goal(s):**

- The City will inspect the MS4 one sector per year such that the City will be inspected over the course of the permit.

### **3. Documentation to be Submitted with each annual report:**

- Summary of Inspection Results for that permit year

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable): Annual
- d. Month / Year of Each Action (if applicable):
  - September 2013 – Inspect all MS4 Control Structures in Sector 1
  - September 2014 – Inspect all MS4 Control Structures in Sector 2
  - September 2015 – Inspect all MS4 Control Structures in Sector 3
  - September 2016 – Inspect all MS4 Control Structures in Sector 4
  - September 2017 – Inspect all MS4 Control Structures in Sector 5

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Ray Norton (Deputy Public Works Director)

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**6. Rationale for choosing BMP and setting measurable goal(s):**

Development and implementation of a MS4 Inspection Program is required under the permit. By dividing the inspection area into 5 distinct areas of approximately equal numbers of MS4 structures, the City will ensure that over the course of the permit, the entire MS4 will be inspected.

**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:**

It is the intent of this BMP to protect existing water quality. Through inspection of the MS4, the City will likely identify structural issues, illicit discharges, illegal connections and other concerns that may affect water quality in downstream water bodies. For the purposes of this SWMP, this BMP will be deemed effective if the City inspects one sector of the city per year such that over the course of the permit, Newnan's MS4 has been completely inspected. Each year, the City will submit a copy of the map / database with the annual report beginning with the annual report due February 15, 2014.

## **Best Management Practice (BMP) #F3 – MS4 Maintenance Program**

### **1. Description of BMP:**

The City of Newnan will implement an MS4 maintenance program. The program will be based on the results of the MS4 inspection program (see BMP #F2) as well as citizen complaints received via various reporting measures. Each year, the City will report the number of work orders developed related to maintenance of the MS4 system as well as the actions taken on each work order during the permit year in the annual report due on February 15<sup>th</sup> of the following year.

### **2. Measurable Goal(s):**

- The City of Newnan will implement a MS4 maintenance program and report the number of structures maintained each year.

### **3. Documentation to be Submitted with each annual report:**

- Summary of maintenance activities conducted on the MS4 during that permit year

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable): On-going
- d. Month / Year of Each Action (if applicable): On-going

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Rob Hill (Engineering Inspector / Stormwater)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

Development and implementation of a MS4 Maintenance Program is required under the permit. The number of structures maintained will serve to illustrate how the City is addressing potential flooding and water quality issues within the MS4.

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**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:**

It is the intent of this BMP to protect existing water quality. The City believes that addressing known issues within the MS4 will help to ensure that pollutants and sediment are prevented from entering local streams and rivers. For the purposes of this SWMP, this BMP will be deemed effective if the City is able to resolve approximately 75% of the work orders generated for the MS4 system in that year.

## **Best Management Practice (BMP) #F4 – Street & Parking Lot Cleaning**

### **1. Description of BMP:**

The City developed a program to use the street sweeper to sweep debris off City streets and parking lots before they enter the storm sewer system. The City of Newnan runs one street sweeper every day to clean the street of debris. The street sweepers are operated and maintained out of the Public Works Department. The Public Works Department developed a map of the service routes of the sweeper. The mileage is recorded daily as well as the number of loads dumped from the sweepers. Debris from the operation will be deposited at the city's transfer station.

### **2. Measurable Goal(s):**

- It is the goal of the City of Newnan to sweep a minimum of 500 miles of streets each permit year.

### **3. Documentation to be Submitted with each annual report:**

- Summary of street sweeping operations during the permit year including miles swept and number of loads of material collected.

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable):
  - Daily (business days only)
- d. Month / Year of Each Action (if applicable): On-going

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Ray Norton (Deputy Public Works Director)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

Development and implementation of a street and parking lot cleaning program is required under the permit. The City has utilized this BMP in the past and has found it to be a cost effective means of removing litter and trash from the streets and public properties prior to it entering the MS4.

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**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:**

It is the intent of this BMP to protect existing water quality. Given that much of the City's rights-of-way include ditches and drainage systems (i.e. MS4 components), removal of litter from the right-of-way and parking lots prevents gross pollutants (i.e. trash and litter) from entering the MS4 and being discharged to streams and rivers. By measuring the amount of litter removed from the roads, the amount of pollution that would have entered the City's streams and rivers can be determined. For the purposes of this SWMP, this BMP will be deemed effective if the City 500 miles of streets each permit year.

## **Best Management Practice (BMP) #F5 – Employee Training**

### **1. Description of BMP:**

The City of Newnan instituted a training program for all City workers in Public Works and Right-of-Way Beautification. The training program uses a mixture of presentations and videos provided by the EPA/EPD and other sources to show good housekeeping practices for maintenance yards, storage areas, vehicle wash facilities, etc. The training sessions are led by the Public Works Director. The topics of the training session are changed each year based upon evaluation and needs. Potential topics include park maintenance, street maintenance, soil erosion practices, land disturbing practices, roadway construction, vehicle washing, material handling and disposal, etc. Any employees missing the training session are required to make up the class during the same calendar year.

### **2. Measurable Goal(s):**

It is the goal of the City of Newnan to conduct one formal education session a year for 90% of city employees responsible for lawn care, street maintenance, and vehicle maintenance. All new hires must complete the training session within 9 months of their hire date.

### **3. Documentation to be Submitted with each annual report:**

- Sign-in sheet documenting workers that received training in that permit year
- Outline of training conducted and topics covered

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
  - Select the topic for the training session by July of each permit year.
  - Send a notice to all affected employees about the training session by July of each permit year.
- b. Implementation Date (if applicable): January 2013
  - Conduct the training session by September of each permit year.
  - Conduct the make-up training session in November of each permit year.
- c. Frequency of Actions (if applicable):
  - The training session will take place in September of each year while the make-up session will take place in November of each permit year.

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d. Month / Year of Each Action (if applicable):

- September: 2013, 2014, 2015, 2016, 2017 – Training session
- November: 2013, 2014, 2015, 2016, 2017 – Make-up training session

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

Michael Klahr, P.E. (City Engineer / Public Works Director)

**6. Rationale for choosing BMP and setting measurable goal(s):**

Educational sessions are critical to teach employees the importance of certain pollution prevention/reduction techniques. For example, the session can teach lawn care employees about the use of fertilizers, pesticides, and water reduction techniques; street maintenance employees can learn about the importance of proper street and storm water inlet cleaning; and vehicle maintenance personnel about recycling and proper car washing.

**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:**

It is the intent of this BMP to protect existing water quality. Cleaning agents, oil and other substances not properly disposed will ultimately reach streams and water bodies by way of contaminating stormwater runoff. These substances could potentially have an adverse effect on aquatic life and plants. As such, while water quality improvements or protection cannot be directly measured, it is the City's belief that this BMP will aid in protecting existing water quality. For the purposes of this SWMP, this BMP will be deemed effective if 90% of City employees responsible for lawn care, street maintenance, and vehicle maintenance receive training each year. As part of the annual report submitted each year, the City will submit a copy of the training materials utilized in the permit year as well as a sign-in sheet listing the names of the employees which were trained that year.

## **Best Management Practice (BMP) #F6 – Waste Disposal**

### **1. Description of BMP:**

The City of Newnan will implement a program to identify the amount of waste collected and disposed of during each reporting period. Additionally, the City will identify how each waste stream is disposed of. Generally, the waste stream will be broken into the following categories.

- Trash & Litter
- Debris from the MS4
- Oils and Chemicals

Each year, the amount of materials disposed of will be documented as well as the manner in which it was disposed of. For example, the estimated cubic yards of trash and litter, gallons of oil, etc. will be determined as well as determining the disposal agency that accepted the waste stream. All results will be documented in the annual report for each reporting period.

### **2. Measurable Goal(s):**

- Provide an estimated amount of waste generated and the means of disposal for each waste stream in the annual report for that year.

### **3. Documentation to be Submitted with each annual report:**

- Summary of waste generated and means of disposal

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable): On-going
- d. Month / Year of Each Action (if applicable): On-going

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Ray Norton (Deputy Public Works Director)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

Development and implementation of waste disposal procedures is required under the permit. The City believes that documentation of the waste stream amounts and disposal methods will demonstrate that waste is being properly disposed of.

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**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:**

It is the intent of this BMP to protect existing water quality. Waste can ultimately reach streams and water bodies by way of contaminating stormwater runoff. These substances could potentially have an adverse effect on aquatic life and plants. As such, while water quality improvements or protection cannot be directly measured, it is the City's belief that this BMP will aid in protecting existing water quality. For the purposes of this SWMP, this BMP will be deemed effective if waste streams identified in this BMP are properly disposed of. As part of the annual report submitted each year, the City will provide an estimated amount of waste generated and the means of disposal for each waste.

## **Best Management Practice (BMP) #F7 – New Flood Management Projects**

### **1. Description of BMP:**

The City of Newnan requires that all new developments comply with the Post Construction Stormwater Management ordinance which includes new City facilities. These requirements include provisions that mandate water quality enhancements be included within the design of the facility. The City will continue to comply with these requirements. Additionally, the City will assess all new flood management projects (i.e. projects associated with development of a new building, parking lot, etc.) to determine if water quality will be impacted by the project and if water quality measures are warranted. A copy of the water quality flow chart and design check list will be submitted for each new project and included in the annual report for each reporting period. For an example of the check list and flow chart see Appendix M.

### **2. Measurable Goal(s):**

A copy of the water quality flow chart and design check list will be submitted for each new project and included in the annual report for each reporting period.

### **3. Documentation to be Submitted with each annual report:**

- A copy of the water quality flow chart and design check list will be submitted for each new project and included in the annual report for each reporting period.

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable): On-going
- d. Month / Year of Each Action (if applicable): On-going

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Michael Klahr, P.E. (City Engineer)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

Development and implementation of procedures for reviewing flood control facilities for water quality improvements is required under the permit. As such, ensuring that all new flood control facilities consider the impacts to downstream water quality will help the City to implement this BMP.

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**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 City believes that including water quality components in flood control projects is prudent when permissible from a fiscal and regulatory perspective and which result in protection or improvement of downstream water quality. As such, the implementation of this BMP will enhance water quality when it results in construction of properly designed and constructed structural components to enhance water quality. For the purposes of this SWMP, this BMP will be deemed effective if 100% of all new flood control projects are assessed for water quality impacts and inclusion of water quality BMPs. As part of the annual report submitted each year, a copy of the water quality flow chart and design check list will be submitted for each new project.

## **Best Management Practice (BMP) #F8 – Existing Flood Management Projects**

### **1. Description of BMP:**

The City of Newnan will select an existing City owned / maintained drainage flood control facility (i.e. detention pond) each year and conduct an assessment for potential retrofitting to address water quality impacts. To determine if the facility should be retrofitted, the City will utilize the checklist included in the SWMP in Appendix M. If a facility is determined to be suitable for retrofit, the facility will be added to the City's Capital Improvements Program needs list and programmed for funding as part of Newnan's stormwater utility improvements/rehabilitation program.

### **2. Measurable Goal(s):**

- Review one existing flood control management project per year utilizing the checklist

### **3. Documentation to be Submitted with each annual report:**

- A copy of the water quality flow chart and design check list for existing flood management facility for each reporting period.

### **4. Schedule:**

- a. Interim Milestone Dates (if applicable): N/A
- b. Implementation Date (if applicable): January 2013
- c. Frequency of Actions (if applicable): Annual
- d. Month / Year of Each Action (if applicable):
  - May 2013 – Review one existing flood control facility
  - May 2014 – Review one existing flood control facility
  - May 2015 – Review one existing flood control facility
  - May 2016 – Review one existing flood control facility
  - May 2017 – Review one existing flood control facility

### **5. Person (Position) responsible for overall management and implementation of the BMP:**

Michael Klahr, P.E. (City Engineer)

### **6. Rationale for choosing BMP and setting measurable goal(s):**

Development and implementation of procedures for reviewing flood control facilities for water quality improvements is required under the permit. As such, ensuring that existing flood control facilities consider the impacts to downstream water quality will help the City to implement this BMP.

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**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 City believes that including water quality components in flood control projects is prudent when permissible from a fiscal and regulatory perspective and which result in protection or improvement of downstream water quality. As such, the implementation of this BMP will enhance water quality when it results in construction of properly designed and constructed structural components to enhance water quality. For the purposes of this SWMP, this BMP will be deemed effective if at least one (1) existing flood control facility is assessed per year for water quality impacts and inclusion of water quality BMPs. As part of the annual report submitted each year, a copy of the water quality flow chart and design check list will be submitted for each analysis.

## **Best Management Practice (BMP) #F9 – Municipal Facilities**

### **1. Description of BMP:**

The City of Newnan will develop a municipal facility inventory and map to document the location of each facility owned and/or maintained by the City with the potential to cause pollution. As part of this BMP, the City will implement an inspection program for the facilities to identify and address potential pollution sources. The inventory and map of the City will be developed within the first year of the permit. As part of the inventory, the City will establish an inspection date for each facility. Following establishment of the inventory and map, the City will begin inspecting each facility per the schedule identified in the map. It is the intent of this schedule to ensure that 100% of all City facilities are inspected prior to December 5, 2017. A copy of the inspection check list for each facility inspected in that reporting period will be included with the annual report for that year. An example of the inspection checklist is included in Appendix N.

### **2. Measurable Goal(s):**

- Develop an Inventory and Map of all facilities owned and maintained by the City which have the potential to cause pollution.
- Implement an inspection program for all City facilities such that 100% of the facilities are inspected according to the schedule established in the inventory and map and prior to December 5, 2017.

### **3. Documentation to be Submitted with each annual report:**

- Inventory map of all municipal facilities
- Completed inspection form for all facilities scheduled for inspection that year (2014-2017)

### **4. Schedule:**

- Interim Milestone Dates (if applicable): N/A
- Implementation Date (if applicable): January 2013
- Frequency of Actions (if applicable): Annual
- Month / Year of Each Action (if applicable):
  - December 2013 – Develop Inventory & Map of City Facilities with Inspection Schedule
  - August 2014 – Inspect 25% of City Facilities
  - August 2015 – Inspect 25% of City Facilities
  - August 2016 – Inspect 25% of City Facilities
  - August 2017 – Inspect 25% of City Facilities

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

Rob Hill (Engineering Inspector / Stormwater)

**6. Rationale for choosing BMP and setting measurable goal(s):**

Development and implementation of a MS4 Inspection Program is required under the permit. The City believes that some City facilities represent a higher than average potential for pollutant discharges to downstream water bodies. As such, the City desires to ensure that these sites are inspected periodically to confirm that the facilities are not acting as pollutant sources.

**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:**

It is the intent of this BMP to protect existing water quality. Through inspections of City facilities, potential pollution sources can be identified and then appropriate actions taken to lessen the risk of causing downstream pollution. For the purposes of this SWMP, this BMP will be deemed effective if an inventory of all municipal facilities is developed by December 2013 and approximately 25% of the facilities are inspected each year thereafter such that 100% of all municipal facilities are inspected as part of this permit period. As part of the annual report submitted each year, a copy of the inventory and inspection reports will be provided for the preceding year.

## Enforcement Response Plan (ERP)

**Permit Requirement:** The permittee must develop and implement an ERP that describes the action to be taken for violations associated with this permit and the SWMP. The ERP will detail the permittee's responses to any noted stormwater violations, including escalating enforcement responses to address repeat and continuing violations. The plan must detail:

- Names of ordinances providing the legal authority to undertake enforcement, including citation of specific ordinance sections;
- Types of enforcement mechanisms available. The ERP should list the enforcement actions the permittee has the authority to use, including such actions as:
  - verbal warnings;
  - written notice of violations;
  - citations;
  - stop work orders;
  - withholding plan approval or other authorizations; and
  - any other available enforcement mechanisms.
- Description of when each enforcement mechanism will be employed, including the path of escalation;
- Time frames for each step, including investigation of noncompliance, sequence and use of enforcement mechanisms, corrective action plan by responsible party, re-inspection of site, etc.
- Description of the methods to be used to track, either manually or electronically, instances of noncompliance, including such items as:
  - name of the owner/operator of facilities and/or the location or address;
  - type of site (e.g. IDDE, construction);
  - description of non-compliance;
  - description of enforcement action(s) used;
  - time frames for each step (e.g. investigation, corrective action, re-inspection);
  - documentation of inspection and enforcement actions taken;
  - documentation of referral to other departments or agencies; and
  - date of violation resolution.

**Response:** The City of Newnan will develop the ERP and submit a copy of the document to EPD with the annual report due on February 15, 2014. Following approval of the ERP, a copy of the document will be included in the SWMP in Appendix P.

## Impaired Waters

**Permit Requirement:** The permittee must identify any impaired waters located within its permitted area, using the latest approved 305(b)/303(d) List of Waters, which contain MS4 outfalls or are within one (1) linear mile downstream of MS4 outfalls. Also, the POC must be identified. For those impaired waters with or without an approved TMDL, the permittee shall propose a Monitoring and Implementation Plan (Plan) addressing each POC. The permittee must annually check whether an impaired water within its permitted area has been added to the latest 305(b)/303(d) list. Newly listed waters must be addressed in the Plan and the SWMP must be revised accordingly. The permittee must report on all monitoring activities in subsequent annual reports. If a TMDL containing a waste load allocation specific to one or more of the permittee's outfalls is approved, then the waste load allocation must be incorporated into the SWMP. All previous and newly approved TMDLs within the permitted areas must be included in either the proposed Plan or a revision to the existing Plan.

The Plan shall include:

- Sample location, whether samples are collected instream (i.e. upstream and downstream), from outfalls during wet weather events, or a combination of both locations. If the permittee chooses to conduct outfall sampling and there are multiple outfalls located on an impaired stream, then the permittee may choose representative outfalls for sampling in place of sampling all outfalls;
- Sample type, frequency, and any seasonal considerations;
- Implementation schedule to start monitoring for each POC;
- 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 these waters, or a schedule for confirming the location of these outfalls; and
- Description of proposed BMPs to be used to control and reduce the POCs.

Each Annual Report will include an assessment of the data trends for each POC. The assessment shall initially include a characterization of baseline conditions to determine the effectiveness of the BMPs employed and what, if any, additional adaptive BMP measures may be necessary to return the waters to compliance with State water quality standards. Following review and comment on the Plan by EPD, the permittee will incorporate any necessary changes into the Plan. For those waters where the permittee is conducting monitoring, the data must be made available to other MS4 permittees upon request. In the event that monitoring is performed in accordance with an EPD-approved Sampling Quality and Assurance plan, and a water is removed from the 303(d) list of impaired waters, then monitoring conducted under the Plan may cease. Monitoring for the purpose of de-listing an impaired water will benefit the permittee through reduced expenses associated with long-term testing.

**Response:** The City of Newnan will develop the Plan and submit a copy of the document to EPD for approval by February 15, 2015. Following approval of the Plan, the Plan will be implemented and a copy of the document will be included in the SWMP in Appendix Q.