

Powder Springs, Georgia



City of Powder Springs, Georgia

Stormwater Management Program

National Pollutant Discharge & Elimination System (NPDES)

Phase I Large Municipal Separate Storm Sewer System (MS4) Permit 2019

Submitted to:

Environmental Protection Division
Georgia Department of Natural Resources

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APPENDICES

- Appendix A NPDES Phase I MS4 Permit
- 1) Permit
- Appendix B Ordinances & Legal Documents
- 1) Intergovernmental Agreement (City and County)
 - 2) Unified Development Code
 - 3) Pesticides, Fertilizers, and Herbicides Application Protocol
 - 4) Cobb County Operational Guidelines for Incidents Other than Structural Fires
- Appendix C Maps & Inventory
- 1) MS4 Inventory Map
 - 2) MS4 Inventory Table
 - 3) MS4 Outfall Map
 - 4) MS4 Outfall Table
 - 5) Industrial Facility Inventory
 - 6) HVPS Facility Inventory
- Appendix D Inspection Checklists & Procedures
- 1) Sanitation Report
 - 2) Dry Weather Outfall Screening Checklist
 - 3) ESPC Plan Review Checklists
 - 4) Stormwater Site Inspection Checklist (HVPS, Municipal, Industrial)
- Appendix E Illicit Discharge Detection and Elimination (IDDE) Plan
- Appendix F Enforcement Response Plan (ERP)
- Appendix G Green Infrastructure/Low Impact Development Program

RESPONSIBLE PARTY AND PLAN CERTIFICATION

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Sharing Responsibility

The City of Powder Springs does not share responsibility with any other entity for implementation of the Best Management Practices outlined in this Plan.

Certification Statement

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

Printed Name: Al Thurman

Title: Mayor

Signature: _____ **Date:** _____

ACRONYMS/DEFINITIONS

BMPs	Best Management Practices
CIP	Capital Improvement Project
DoA	Georgia Department of Agriculture
E&S	Erosion & Sedimentation
EPD	Georgia Environmental Protection Division
ERP	Enforcement Response Plan
GESA	Georgia Erosion & Sedimentation Act
GI/LID	Green Infrastructure/Low Impact Development
GIS	Geographic Information System
GSMM	Georgia Stormwater Management Manual
GSWCC	Georgia Soil & Water Conservation Commission
HazMat	Hazardous Materials
HVPS	Highly Visible Pollution Source
IDDE	Illicit Discharge Detection and Elimination
IGP	Industrial General Permit
LDA	Land Disturbing Activities
LEED	Leadership in Energy and Environmental Design
LIA	Local Issuing Authority
LID	Low Impact Development
MNGWPD	Metropolitan North Georgia Water Planning District
MS4	Municipal Separate Storm Sewer System
MSDS	Materials Safety Data Sheet
NOI	Notice of Intent
NPDES	National Pollutant Discharge & Elimination System
POC	Pollutant of Concern
ROW	Right-of-Way
SOP	Standard Operating Procedure
SWMP	Stormwater Management Program
SWP3	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load

EXECUTIVE SUMMARY

The City of Powder Springs received coverage under the National Pollutant Discharge and Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) Permit (GAS000129) on May 13, 2019, as required by provisions of the Georgia Water Quality Control Act and the Federal Clean Water Act. A copy of the permit and Permit Reapplication Form are included in Appendix A. This permit requires the development of a Stormwater Management Program (SWMP), to address the following program elements, as stipulated in CFR 122.26(d)(2)(iv)(A) through 122.26(d)(2)(iv)(D):

- Structural and Source Control Measures
- Illicit Discharge Detection and Elimination Program (IDDE)
- Industrial Facility Stormwater Discharge Control
- Construction Site Management

The Georgia Environmental Protection Division (EPD) has also required the City of Powder to expand its SWMP to include Best Management Practices (BMPs) to address the following required modifications:

- Highly Visible Pollutant Sources
- Enforcement Response Plan (ERP)
- Impaired Waters
- Municipal Employee Training
- Public Education
- Public Involvement
- Post-Construction Stormwater Controls

The Stormwater Management Program described within this document demonstrates the commitment of the City of Powder Springs to water resources protection.

SWMP IMPLEMENTATION RESPONSIBILITY

The City of Powder Springs shares responsibility for BMP permit implementation with one other entity – Cobb County. Cobb County performs public education activities and workshops, manages stream monitoring stations, and holds recycling/ household waste collections programs in Powder Springs in accordance with its Intergovernmental Agreement, which is included in Appendix B.

1. STRUCTURAL & SOURCE CONTROL MEASURES

Permit Section 3.3.1: Structural and Source Control Measures, Table 3.3.1

1.1. MS4 CONTROL STRUCTURE INVENTORY AND MAP

1.1.1. Description

The City of Powder Spring's MS4 is made up of the structures and facilities that are used for collecting, conveying, storing and/or treating stormwater from the source drainage area to the point of final outlet. The City's NPDES Phase I Large MS4 Permit defines the MS4 as follows:

"Municipal Separate Storm Sewer System or an MS4 means a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels or storm drains, owned or operated by a municipality or other public body, designed or used for collecting or conveying stormwater runoff and is not a combined sewer or part of a Publicly Owned Treatment Works."

The City of Powder Springs has completed a Geographic Information System (GIS) inventory and map of the MS4. The MS4 inventory map and table are included in Appendix C. The City will continue to maintain and update this inventory on an annual basis. This will be accomplished through review of new development as-built maps as well as field inspections.

1.1.2. Measurable Goals:

- Provide an inventory and map of MS4 control structures.
- Update the inventory and map as necessary and provide the number of MS4 structures added during the reporting period in subsequent Annual Reports.

1.1.3. Schedule

- Annual, 2019 – 2024: Maintain and update inventory.

1.1.4. Items to be included in Annual Report:

- Updated inventory and map of the MS4.
- Number of MS4 structures added during the reporting period
- Total number of structures in the inventory

1.2. MS4 INSPECTION AND MAINTENANCE PROGRAM

1.2.1. Description

The City will inspect 100% of the MS4 system components included in the MS4 control structure inventory over the five-year period of the permit and will inspect, at a minimum, 5% of the MS4 structures each year. The City will visually inspect the MS4 in accordance with the following procedures:

- Inspections shall generally include a condition assessment of the various system elements including catch basins, storm drain lines, ditches, and publicly owned or operated stormwater controls (i.e. detention/retention ponds).
- Storm drain lines will be visually inspected where they outfall into a structure or open drainage way, unless access is restricted due to obstructions.
- Upon completion of an inspection, the City will determine the need for maintenance based on the results of the inspection and the maintenance criteria.
- The condition assessment will include a visual evaluation of the structure that addresses structural condition and maintenance need. The following conditions will be noted and indicate that a structure nee maintenance:

Table 1: MS4 Inspection & Maintenance Criteria

Structure	Standard for Maintenance
Catch Basins	Sediment or debris accumulation that exceeds the depth of the invert of the lowest pipe into or out of the basin.
Ditches	1/2 filled with sediment or debris
Pipes	1/2 filled with sediment or debris
Detention Ponds	1/2 filled with sediment, debris or trash blocking the outlet

Upon completion of an inspection, the City will determine if maintenance is needed based on inspection results and the City's maintenance criteria. The City will prioritize maintenance needs based on their potential impact to the functionality of the public MS4. Maintenance shall be prioritized and performed in general accordance with the following standards:

- The City will schedule appropriate maintenance as needed and in accordance with available City resources.
- The City will respond to all citizen complaints related to MS4 structures, and will perform maintenance as needed.
- Sediment will be removed before 50% of the capacity of the structure has been lost.
- Trash and debris will be removed from structures.
- Manmade and natural objects that are causing or could potentially cause a blockage to the system will be removed.
- Excess emergent vegetation will be removed.

- Bank side vegetation and vegetation in the maintenance right-of-way will be mowed or trimmed, but not removed to protect against erosion.
- Ditches that are not draining properly will be re-graded to match existing pipe invert grades, to the extent possible.
- Materials removed from the MS4 during maintenance will be properly disposed of by the City or a contractor hired by the City.
- Maintenance activities for MS4 structures are documented through the use of a Work Order database maintained by the City.

1.2.2. Measurable Goals

- Inspect 100% of the MS4 system components included in the MS4 control structure inventory over the five-year period of the permit. Inspect, at a minimum, 5% of the MS4 structures each year.
- Conduct maintenance on MS4 structures as needed.

1.2.3. Schedule

- a. *Interim Milestone Dates:* N/A
- b. *Implementation Date:* 2019
- c. *Frequency of Actions:* Annual
- d. *Month/Year of Each Action:* 2019 - 2024

1.2.4. Items to be included in Annual Report:

- Summary of MS4 Inspections, including the number and percentage of total structures inspected during the reporting period.
- Table summarizing individual inspections with a record for each structure inspected, and the findings of that inspection.
- Copies of Work Orders created and completed related to MS4 structure maintenance.

1.3. PLANNING PROCEDURES

1.3.1. Description

1.3.1.A. Comprehensive Plan

The City of Powder Spring's Comprehensive Plan outlines goals and specific policies that are designed to protect the local quality of life and will guide the City through 2025. A short term work plan 'Springs in Motion Comprehensive Plan' was recently updated in 2017 to make necessary updates to the 2005 plan, while building off of the momentum of the recent Springs in Motion LCI study conducted in 2016. The Plan guides future land use, provides the framework for the City's Zoning Ordinance, addresses natural resource protection and expanding its network of parks and greenways, and is consistent with the regional water plan and environmental planning criteria.

The City adopted the Springs in Motion Comprehensive Plan to meet a short-term work plan through the year 2022, and it can be viewed at the following weblink:

<https://www.cityofpowdersprings.org/669/Planning>

1.3.2. Measurable Goals

- Review and update the Comprehensive Plan, as needed.

1.3.3. Schedule

- Annual, 2019 – 2024: Review planning procedures.

1.3.4. Items to be included in the Annual Report

- Description of any changes made to the Comprehensive Plan or planning procedures.

1.4. STREET MAINTENANCE

1.4.1. Description

The City implements a right-of-way pickup program to reduce polluted runoff originating from streets within City limits. The current method involves litter pick up by hand performed at least once per week but may be conducted additional times, as needed. The amount of debris removed is recorded using a Sanitation Report, an example of which is located in Appendix D. The total amount of debris removed will be included in the annual report.

1.4.2. Measurable Goals:

- Conduct weekly right-of-way pickup activities for streets within the City limits.

1.4.3. Schedule

- Ongoing, 2019 – 2024.

1.4.4. Items to be included in Annual Report

Documentation of right-of-way pickup activities (Sanitation Reports) including number of bags of litter removed per reporting period.

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1.5. FLOOD MANAGEMENT PROJECTS

1.5.1. Description

1.5.1.A. Flood Management Capital Improvement Project Water Quality Impact Assessment for New Structures

The City will ensure that all new flood control projects are assessed for water quality impacts. For the purposes of this BMP, the City interprets “Flood Control Projects” to refer to detention/retention ponds and other stormwater management facilities. All new developments are currently required to comply with the City’s Stormwater Management Ordinance and Georgia Stormwater Management Manual (GSMM), which require that stormwater management controls address water quality as well as water quantity. The City currently reviews all development projects that include flood control structures pursuant to the Stormwater Management Ordinance and GSMM. The Stormwater Management Ordinance is included in Article 11 of the UNICODE located in Appendix B.

The City of Powder Springs also has a Flood Damage Prevention Ordinance in place that serves to protect water quality by limiting the impacts that flood waters can have on the environment. This ordinance is required by the District and for participation in the National Flood Insurance Program. The Flood Damage Prevention Ordinance is included in Appendix B.

1.5.1.B. Flood Management Capital Improvement Project Water Quality Impact Evaluation for Existing Structures

The City of Powder Springs has developed Water Quality Assessment Procedures to ensure that existing City flood management projects (i.e., detention and retention ponds) are assessed for potential retrofitting to address water quality impacts. These Procedures will meet the requirements of the City’s most recent MS4 Phase I permit.

The City will perform Water Quality Assessments for all City-owned detention and retention ponds during the 5-year permit period to assess the potential to retrofit these publicly-owned structures to incorporate additional control measures to improve water quality treatment. The assessment will also analyze the facility’s compliance with the City’s Stormwater Management Ordinance and GSMM, which requires that stormwater management controls address specified water quality as well as water quantity criteria. Retrofitting activities will be conducted as specified in the Water Quality Assessment Procedures, and as funding is available.

1.5.2. Measurable Goal:

- Ensure new flood management projects are assessed for water quality impacts in accordance with the City’s Stormwater Management Ordinance.

- Perform Water Quality Assessment for 100% of City-owned detention and retention ponds within the 5-year permit period, with a minimum of 5% of structures per year.
- Evaluate potential retrofitting, if applicable.

1.5.3. Schedule

- 2019 – 2024: Ensure all new Flood Management Projects are assessed for water quality impacts.
- 2019 – 2024: Review all existing flood management facilities that are retrofitted during the reporting period.

1.5.4. Items to be included in the Annual Report

- Number of plans that included new flood management projects that were reviewed during the reporting period.
- Records of any assessment and/or retrofitting activities conducted during the reporting period.

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1.6. MUNICIPAL FACILITIES

1.6.1. Description

This program element addresses municipally-owned facilities with the potential to cause pollution, and they will be referred to collectively as “Municipal Facilities.” These exclude any facilities addressed in Section 3.1. The following list constitutes the City’s inventory of municipal facilities with the potential to cause pollution.

- City Hall
- Community Development
- Police Department
- Public Works

City staff will inspect municipal facilities with the potential to discharge pollutants to the MS4, and all municipal facilities sites will be inspected at least once every 5 years, with a minimum of 5% or one facility per year, until all facilities have been inspected. The Facilities Municipal Inspection Checklist, found in Appendix D, will be used for municipal site inspections, and records shall be maintained on problems found and actions taken. If sites are found to need improvements, the appropriate department will be notified of the problem. City staff will then perform a re-inspection, after the stipulated timeframe or request follow up documentation from the facility, if deemed necessary, to ensure that proper action has been taken.

1.6.2. Measurable Goals

- Update the municipal facilities inventory annually, if needed. Annually inspect the municipal facilities listed in the municipal facilities inventory such that 100% of all the facilities are inspected every 5 years.
- Document site inspections conducted during the permit period using the Stormwater Inspection Checklist.

1.6.3. Schedule

- 2019 – 2024, Inspect 100% of municipal facilities.

1.6.4. Items to be included in the Annual Report

- Updated Municipal Facility Inventory
- Copy of the completed inspection checklist for each municipal facility.
- Summary of any activities conducted to address issues found during inspection, if necessary.

1.7. PESTICIDE, HERBICIDE, & FERTILIZER APPLICATION

1.7.1. Description

1.7.1.A. Pesticide Applicator Certification Program

The City of Powder Springs relies on the Georgia Department of Agriculture (DoA) and the Cobb Cooperative Extension Service (CES) to address requirements for Pesticide Applicator Training and Certification. The DoA requires commercial applicators of restricted use pesticides (including herbicides, insecticides, fungicides, plant growth regulators, and defoliants) to obtain and retain a "Commercial Pesticide Applicators License." The DoA also requires that distributors of restricted pesticides obtain and retain a "Pesticide Dealer's License." Continuing education units are required each year to maintain the license.

Prior to issuing a business license, the City of Powder Springs will require applicants who are likely to require a commercial pesticide applicators license to provide proof that they hold the appropriate State license.

The CES provides training opportunities to homeowners, private applicators, commercial applicators and municipal applicators that desire education on the appropriate management and use of pesticides. This training (though not required for state licensing) is designed to assist persons in passing the state exam, which is required to obtain a license.

1.7.1.B. Municipal Fertilizer, Pesticide, and Herbicide Use Program

City use of pesticides, fertilizers and herbicides is limited to 10-10-10 fertilizer (or similar) for use in parks and recreational areas. "Round Up" is used to control kudzu and other weeds. To prevent accidental spillage, herbicides are mixed at the Public Works facility and then transported to locations to be treated. Crew Supervisors in charge of herbicide application are well versed in standard operating procedures (SOPs) outlined in the Pesticides, Fertilizers and Herbicides Application Protocol. Herbicide application is limited to approximately three times per year, mainly during the growing season. Insecticide, such as Fire Ant Killer, Wasp Killer and insect repellent, is purchased on an "as needed" basis. The Pesticides, Fertilizers, and Herbicides Application Protocol is included in Appendix B.

1.7.2. Measurable Goals:

- Continue to utilize DoA Program to certify commercial applicators within the City.
- Review Pesticides, Fertilizers, and Herbicides Application Protocol on an annual basis.
- 100% of City employees involved in pesticide, herbicide, and fertilizer application will receive applicable certification through the GA DoA.

1.7.3. Schedule:

- Ongoing, 2019 – 2024: Continue to require DoA Program Certification for commercial applicators within the City.
- Ongoing, 2019 – 2024: Review Pesticides, Fertilizers, and Herbicides Application Protocol on an annual basis.

- 2020: Certification of City employees involved in pesticide, herbicide, and fertilizer application through the GA DoA.

1.7.4. Items to be Included in the Annual Report:

- City Certifications from GA DoA and/or documentation of other program activities during the reporting year.

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2. ILLICIT DISCHARGE DETECTION & ELIMINATION (IDDE)

Permit Section 3.3.2: Illicit Discharge Detection and Elimination Program (IDDE), Table 3.3.2

2.1. LEGAL AUTHORITY

2.1.1. Description

The City adopted the Illicit Discharge and Illegal Connection Ordinance of the Metropolitan North Georgia Water Planning District (MNGWPD) as part of the the Stormwater Quality Management Ordinance. This existing ordinance prohibits non-stormwater discharges into the storm sewer system and establishes appropriate enforcement procedures associated with the City's Illicit Discharge Detection & Elimination (IDDE) Program. This ordinance prohibits illicit discharges to the public MS4, grants the City the authority to enter private property to investigate suspected illicit discharges, and provides the City with the means to enforce violations of this ordinance. The Illicit Discharge and Illegal Connection Ordinance is included in Article 19 of the UNICODE located in Appendix B.

2.1.2. Measurable Goal

- a. Enforce 100% of violations of the Illicit Discharge Ordinance.
- b. Annually evaluate the Illicit Discharge and Illegal Connection Ordinance to determine if revisions are required.

2.1.3. Schedule

- Annual, 2019 – 2024: Review & enforce Illicit Discharge Ordinance.

2.1.4. Items to be included in the Annual Report

If the ordinance is revised during the reporting period, a copy of the revised ordinance will be submitted to Georgia EPD.

2.2. OUTFALL INVENTORY & MAP

2.2.1. Description

The NPDES Phase I MS4 permit defines an “MS4 Outfall” to be *“the most downstream point (i.e. final discharge point) on an MS4 where it discharges to waters of the State.”* The City maintains an inventory of MS4 Outfalls that discharge from the City MS4 to waters of the State. The map and inventory of the MS4 Outfalls are available in Appendix C.

Each year, the City will update the map to reflect the addition of outfalls from new infrastructure projects or developments and remove from the inventory any outfalls that have been reclassified or removed. The updated outfall inventory and map will be included with the Annual Report.

2.2.2. Measurable Goals

- Maintain and update a database inventory of all outfalls from the MS4 within the City Limits, including those MS4 outfalls added or identified during each reporting period.

2.2.3. Schedule

- Annual, 2019 – 2024: Update MS4 Outfall Map and Inventory.

2.2.4. Items to be included in the Annual Report

- Updated inventory and map of the MS4 outfalls, identifying the names and locations of all waters of the State that receive discharges from those outfalls.
- Summary of outfalls added during the reporting period and the total number of outfalls in the inventory.

2.3. IDDE PLAN

2.3.1. Description

The City will perform dry weather screening (DWS) of 100% of its MS4 outfalls within this 5-year permit cycle, and will screen no less than 5% of MS4 outfalls in any given year. Outfalls will be screened utilizing the IDDE Plan and associated “Dry Weather Screening Checklist”, which are included in Appendix E. The City will investigate any potential illicit discharges in accordance with the EPD approved IDDE Plan. Should the City positively identify any illicit discharges, the City will conduct source tracing activities and enforce the provisions of its Stormwater Quality Management Ordinance for 100% of positively identified illicit discharges.

The City has developed an IDDE Plan, included in Appendix E, to formalize the City’s procedures for dry weather screening of outfalls, the procedures for investigating potential illicit discharges via source tracing activities, and the procedures for enforcement of the Stormwater Quality Management Ordinance.

2.3.2. Measurable Goals

- Implement the IDDE plan outlined in the SWMP
- Dry weather screen 100% of all MS4 outfalls over a five-year period.
- Dry weather screen at least 5% of MS4 outfalls each year.
- Investigate and perform source tracing for 100% of suspected illicit discharges.
- Enforce the Illicit Discharge Ordinance and ERP for 100% of positively identified illicit discharges.

2.3.3. Schedule

- Ongoing, 2019 – 2024: Dry weather screen MS4 outfalls annually
- Ongoing, 2019 – 2024: Perform source tracing as needed.
- Ongoing 2019 – 2024: Enforce Illicit Discharge Ordinance.

2.3.4. Items to be Included in the Annual Report

- Provide the number of MS4 outfalls screened during the reporting period.
- Provide a map and completed dry weather screening forms (Dry Weather Outfall Screening Checklist) for all MS4 Outfalls screened within the reporting period.
- Records of any source tracing or enforcement activities conducted as a result of the dry weather screening activities, including copies of Source Tracing Forms.

2.4. SPILL RESPONSE PROCEDURES

2.4.1. Description

The Powder Springs Public Works and public safety departments will respond to all spills that occur within the City limits. Documentation on spill occurrences during the reporting period will be provided with the annual report. Generally, spills of known, nonhazardous substances less than 55 gallons or 300 pounds (dry volume) can be contained on an impervious surface using in-house spill equipment. All spills of unknown substances, spills larger than 55 gallons (liquid volume) or 300 pounds (dry volume), and/or those that enter the storm sewer and/or waterway require that the Cobb County Fire & Emergency Services personnel be notified immediately to handle the cleanup. A hazardous materials incident requires more caution and deliberation in size-up than most fire situations. The City will exercise size-up tactics which do not expose the response crew to risk and rely upon Cobb County Fire & Emergency Services to take the lead on significant spills.

Cobb County Fire & Emergency Services responds to spills according to the Cobb County Operational Guidelines for Incidents Other than Structural Fires, included in Appendix B. Records of spills attended by Cobb County Fire & Emergency Services personnel are held by the Cobb County Fire Department and are stored within a computer database.

2.4.2. Measurable Goal

- Maintain documentation on any spill occurrences and cleanup performed by City staff.

2.4.3. Schedule

- Annual, 2019 – 2024

2.4.4. Items to be included in the Annual Report

- Documentation on any spill occurrences and cleanup performed by City staff.

2.5. PUBLIC REPORTING PROCEDURES

2.5.1. Description

The City of Powder Springs has established procedures for encouraging and addressing citizen complaints about water quality and reports of illicit discharges/illegal dumping. Complaints can be made through the City's official stormwater website that allows for citizens and visitors to report concerns, including illicit discharges and illegal dumping. The link to this page can be found on the City's homepage at:

<https://www.cityofpowdersprings.org/522/Report-Drainage-Problems-or-Illicit-Disc>

This website also provides a link and a phone number (770) 943-8010 for City residents to contact the City for any purpose, including to report illicit discharges or illegal dumping in the storm sewer system as well as an after-hours phone number (770) 943-8010 for reporting illicit discharges outside of City hours. Information received through the website will be referred to the appropriate department. The City promotes this website as a part of other public education initiatives (City sanitation bill and Stormwater website).

City administrative staff are responsible for receiving citizen complaint calls, and using the caller's information to generate a work order. The work order is then passed to the Public Works Department, which is responsible for taking action to address calls that relate to water quality within three (3) business days. The Public Works staff will record actions taken to address the complaint in the work order and maintain a database of all finished work orders related to potential illicit discharges, illegal dumping, and other water quality violations. The Public Works Department maintains a database of all finished work orders and provides monthly reports to Council.

2.5.2. Measurable Goals

- Promote phone number and City of Powder Spring's website to encourage the public to report illicit discharges/illegal dumping in the storm sewer system.
- Perform at least one notification per reporting period to inform the public on methods to report an observed illicit discharge.
- Investigate 100% of all water quality complaints received within three (3) business days and take appropriate action for 100% of complaints requiring action.
- Record IDDE complaints and actions taken in the City's Work Order Database.

2.5.3. Schedule

- Annual, 2019 – 2024: Perform at least one notification per reporting period to inform the public on methods to report an observed illicit discharge.
- Ongoing, 2019 – 2024: Update Work Order Database as calls are received and record/take action for complaints received, as appropriate.

2.5.4. Items to be included in the Annual Report

- Copy of formal notification used to inform the public on methods to report an observed illicit discharge or illegal dumping in the storm sewer system

- Summary from the Work Order Database, including documentation of citizen complaints, investigations, and actions taken during the reporting period.

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2.6. PROPER MANAGEMENT & DISPOSAL OF USED OIL & TOXIC MATERIALS

2.6.1. Description

2.6.1.A. Hazardous Material Public Education

The City will maintain a display of proper management and disposal related informational materials (i.e. brochures, pamphlets, etc.) at City Hall and refill the display on a regular basis. These brochures will address such topics as the following: The Management of Household Hazardous Materials.

- Proper Handling and Disposal of Hazardous Waste
- Good Housekeeping for Commercial Establishments
- Stormwater Pollution Prevention
- Picking Up After Your Pet
- Septic System Maintenance
- Promotion of Public Involvement Activities

The City will also work with Keep Powder Springs Beautiful to identify local vendors that will accept used waste oil from local residents. The current list along with links to other resource websites such as the Clean Water Campaign (CWC), Cobb County Stormwater, and Gwinnett Clean and Beautiful will be included electronically on the city's stormwater website that provide additional information on hazardous materials management.

2.6.1.B. Recycling Program

The City of Powder Springs operates a single-stream, curbside recycling program for all City residents. Recyclables are picked up once a week when placed in specialized recycling bins, provided by the City. The City contracts with a private professional hauler to collect recyclable materials and dispose of them properly at a recycling facility. The items collected by the City for recycling include:

- Plastic Containers #1 - #7
- All Paper (newspapers, magazines, junk mail)
- Cardboard
- Metal Containers

2.6.2. Measurable Goals:

- Maintain educational information and materials related to proper management and disposal of used oil and toxic materials on the City's webpage and/or at City Hall.
- Operate the weekly curbside recycling program.

2.6.3. Schedule

- Ongoing, 2019 – 2024: Maintain links to applicable webpages on City's website.

- Ongoing, 2019 – 2024: Operate curbside recycling program.
- 2019-2024: Display Brochures at City Hall

2.6.4. Items to be included in the Annual Report

- Details of recycling activities
- Copy of City's website promoting proper management and disposal of used oil and toxic materials.
- Copies of any brochures distributed during the reporting period.

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2.7. SANITARY SEWER INFILTRATION CONTROLS

2.7.1. Description

The City of Powder Springs does not own or operate the sanitary sewer system within its jurisdiction; The city relinquished this responsibility to Cobb County on June 23, 2016. A copy of the Interagency agreement is included in Appendix B.

Where the dry weather screening program returns results that could indicate infiltration of sewage into the MS4, the City will investigate the matter in accordance with procedures described in the IDDE Plan included in Appendix E of this SWMP. Confirmed or suspected sewage spills from the sanitary sewer system will immediately be reported to the Cobb County Department of XXX at (insert phone no.). The City will follow up with the Department of Water Resources to confirm that suspected and confirmed sewage spills were appropriately addressed. The actions taken to address the spill will be recorded in a log that will be included in the Annual Report.

2.7.2. Measurable Goal:

- Log of all confirmed or suspected sewage spills from the sanitary sewer system reported to the **Cobb County Department of Water Resources.**

2.7.3. Schedule

- Ongoing, 2019 – 2024: Investigate and Report Suspected Sewer Overflows or Discharges to Cobb County

2.7.4. Items to be Included in the Annual Report

- Details on activities performed during the reporting period as recorded in the sanitary sewer spill log, included in Appendix D.

3. INDUSTRIAL FACILITIES STORMWATER DISCHARGE CONTROL

Permit Section 3.3.3: Industrial Facility Stormwater Discharge Control, Table 3.3.3

3.1. INDUSTRIAL FACILITY INVENTORY

3.1.1. Description

The City of Powder Springs currently maintains an inventory of industrial facilities that discharge to the City's MS4. This list is based on the EPD's Industrial Storm Water General Permit (IGP), Notice of Intent (NOI), No Exposure Exclusion (NEE) online listings,. According to the Permittee List for NPDES Industrial Stormwater IGP and GEOS system on the EPD website, there are eight (8) facilities located in the City of Powder Springs as of November 8, 2019.

The City of Powder Springs will continue to modify and update this list on an annual basis in accordance with the informational sources listed above. The City will include any changes to the inventory in the Annual Report.

3.1.2. Measurable Goals

- Annual update of Industrial Facility Inventory

3.1.3. Schedule

- Annual, 2019 – 2024: Update Industrial Facility Inventory

3.1.4. Items to be Included in the Annual Report

- Updated Industrial Facility Inventory

3.2. INDUSTRIAL STORMWATER INSPECTION PROGRAM

3.2.1. Description

The City of Powder Springs will conduct on-site stormwater inspections for 100% facilities on the industrial inventory over the five-year period of the permit and will inspect, at a minimum, 5% of the facilities each year.

- City staff will first determine whether the industrial facility discharges to the City MS4. If the facility does not discharge to the City MS4, it shall be removed from the Industrial Facility Inventory.
- City staff will check to ensure that the facility has submitted a NOI to be covered under the NPDES IGP, if it is required.
- City staff will perform a cursory review of the implementation status of the facility's associated SWP3.
- The City will perform an inspection of the facility utilizing the Industrial Facilities Inspection Checklist included in Appendix D.
- Should an inspection reveal a potential threat to water quality in the MS4, City staff will notify the industry or business, provide them with a copy of the inspection checklist, and perform a re-inspection to ensure that all necessary corrections were made.
- Investigation and enforcement of any identified illicit discharges will be handled in accordance with the City's Illicit Discharge Ordinance and ERP.
- If the violation is still not corrected, EPD will be notified of the problem. The City will also notify the EPD if assistance is needed for enforcement of the NPDES IGP or if there is a threat to Waters of the State. If EPD intervention does not ensure a resolution to the problem, the City of Powder Springs may elect to perform water quality monitoring at the facility outfall. In addition, the City may, during the investigation of a violation of the City's Illicit Discharge Ordinance, complete or require monitoring of a suspected industrial facility, in order to secure evidence to support the alleged violation.
- The City shall maintain records of inspections results, problems found, and actions taken. Documentation of these inspections will be submitted each year with the Annual Report.

As required by Section 3.3.3.2.b of the MS4 Permit, the City has implemented a monitoring program for stormwater runoff from industrial facilities, waste facilities, and hazardous waste treatment, storage and disposal facilities that the City determines are contributing a substantial pollutant load to the MS4. In order to determine if an industrial facility has the potential to contribute a substantial pollutant load to the MS4, the City will perform the following steps:

- a) Identify all industrial facilities that are listed on the City's most current Industrial Facility Inventory, as described above, and have a discharge that drains to and is located within one (1) mile of an impaired waterbody listed on Georgia's latest approved 305(b)/303(d) List of Waters.

b) If an industrial facility planned for inspection during the current reporting period discharges to and is located within one (1) mile of a listed impaired waterbody, the City will verify that the industrial facility discharges stormwater to the MS4 during the site inspection and evaluate whether the industrial facility may be contributing a substantial pollutant load to the impaired stream. This evaluation may include any or all of the following: 1) a visual inspection of the outfall to identify possible evidence of pollutant discharges including discoloration, foam, floatables, odor, etc.; 2) a review of hazardous waste manifests; 3) a review of the facility's existing stormwater pollution prevention plan (SWP3); 4) a review of material safety data sheets for materials located onsite; and/or review monitoring data maintained by the industrial facility to determine if the facility may be discharging a pollutant(s) that are contributing to the impairment or for which a Total Maximum Daily Load (TMDL) has been established for the impaired stream.

If the City determines that the industrial facility may be discharging a substantial pollutant load to the MS4 and has conducted the monitoring required by the IGP, the City will provide the results of the monitoring conducted by the facility during the current reporting period in the Annual Report. If the City has evidence that the industrial facility is discharging a substantial pollutant load to the MS4 and has not conducted any water quality monitoring, the City may elect to conduct water quality monitoring (or retain the services of a third party contractor) for the listed impairment and will submit the results of monitoring activities it conducts or oversees for the industrial facility in the Annual Report.

3.2.2. Measurable Goals

- Inspect 100% of industrial facilities in the City's inventory over the 5-year permit period, and at a minimum, 5% of the facilities each year.

Implement water quality monitoring program for industrial sites if the industrial facility is determined to discharge a substantial pollutant load to the MS4. This may include reviewing water quality monitoring results provided by the industrial site or, in some circumstances, conducting water quality monitoring.

3.2.3. Schedule

- 2019 – 2024: Inspect 100% of industrial facilities.

3.2.4. Items to be Included in the Annual Report

- Copy of completed inspection checklist for each industrial facility inspected during the reporting period.
- Total number and percentage of facilities inspected during the reporting period.
- Summary of water quality monitoring results, if applicable

3.3. ENFORCEMENT PROCEDURES

3.3.1. Description

If upon inspection, an industrial site is found to have issues that would be considered an illicit discharge, then the City will take enforcement action(s) as outlined in the ERP. If an illicit discharge has not taken place but practices on-site indicate a high probability that such a discharge could occur, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection. The City will also make the operator aware of Volume 3 of the GSMM that discusses pollution prevention and good housekeeping.

3.3.2. Measurable Goals:

- Implement enforcement procedures when violations are discovered during inspections of industrial facilities.
- Document enforcement actions taken in violation/enforcement action log.

3.3.3. Schedule

- Ongoing, 2019 – 2024: Document enforcement actions in violation/enforcement log.

3.3.4. Items to be Included in Annual Report

- Documentation of enforcement actions taken during the reporting period

3.4. EDUCATIONAL ACTIVITIES

3.4.1. Description

The City will distribute the EPD's informational handout on the requirements of the NPDES IGP or other industrial stormwater best practices educational information to industrial facilities during industrial stormwater site inspections. These brochures may address topics that include, but are not limited to, the following:

- The Management of Household Hazardous Materials.
- Proper Handling and Disposal of Hazardous Waste
- Good Housekeeping for Commercial Establishments
- Stormwater Pollution Prevention

3.4.2. Measurable Goals

- Provide educational information to facilities listed on the City's Industrial Facility Inventory during inspections.

3.4.3. Schedule

- Annual, 2019 – 2024: Provide education information to industrial facilities during inspections.

3.4.4. Items to be included in the Annual Report

- Copy of educational information distributed to industrial facilities.

4. CONSTRUCTION SITE MANAGEMENT

Permit Section 3.3.4: Construction Site Management, Table 3.3.4

4.1. LEGAL AUTHORITY

The City of Powder Springs is currently a Local Issuing Authority (LIA) for LDA Permits as defined by the Georgia Erosion & Sedimentation Act (GESA). An updated version of the model Erosion, Sediment Control and Pollution Prevention ordinance was adopted in 2010 and can be located in Article 9 of the UNICODE located in Appendix B.

Accordingly, the City administers the programs described below in accordance with the responsibilities related to being an issuing authority. EPD has taken the position that any program in compliance with the regulations of GESA will also be considered in compliance with those requirements of the NPDES MS4 program that relate to E&S.

4.1.1. Measurable Goals

- Annually evaluate the Erosion and Sedimentation ordinance for compliance with the NPDES Phase I permit.

4.1.2. Schedule

- Annual, 2019 – 2024: Annual Review of ordinance.

4.1.3. Items to be Included in the Annual Report

- A copy of the E&S Ordinance, if updated, during the reporting period.

4.2. SITE PLAN REVIEW PROCEDURES

4.2.1. Description

The City of Powder Springs requires submittal of approved Erosion, Sedimentation and Pollution Control Plans (ESPCP) prior to issuance of a LDA Permit. This ensures the proposed sedimentation and erosion plan and post-construction stormwater control measures will comply with the City's E&S Ordinance and effectively reduce pollutants entering the MS4. Following City approval, plans are submitted to the Georgia Soil and Water Conservation Commission (GSWCC). The ESPCP must be approved prior to the City issuing a LDA permit.

In addition to review of plans for compliance with the City's Erosion and Sediment Control Ordinance, construction plans are reviewed for compliance with numerous other City regulations including: the Unified Development Code; Post-development Stormwater Management Ordinance; Stream Buffer Ordinance; and Floodplain Management Ordinance. Both the plan preparers and plan reviewers are required to utilize ESPC Plan Review Checklists to ensure compliance with City regulations. A copy of the checklist is included in Appendix D.

4.2.2. Measurable Goals

- All qualifying developments within Powder Springs will have their ES&PC plans reviewed for compliance with the City's Erosion and Sediment Control Ordinance.

4.2.3. Schedule

- Ongoing, 2019 – 2024: As ES&PC Plans are submitted

4.2.4. Items to be Included in the Annual Report

- List of the development projects that had ES&PC plans in the reporting year.
- Number of plans that were reviewed, approved or denied in the reporting year.
- Number of LDA permits issued in the reporting year.

4.3. INSPECTION PROCEDURES

4.3.1. Description

The City of Powder Springs is responsible for inspecting construction projects located within the city limits. The inspections include checking E&S control measures for compliance with the approved E&S plans and LDA permit. The authority for such inspections follows the City's E&S Ordinance. A copy of the completed NOI, sent to the EPD, will be provided from each developer to the City. The City meets with each developer prior to land disturbance activities to review erosion and sediment control requirements. Each developer must sign an Erosion and Sediment Control affidavit prior to issuance of the LDA permit. A copy of the Plan Review checklist is included in Appendix D.

The City conducts comprehensive site inspection after land disturbing activities commence to verify compliance with applicable E&S requirements. Sites that have an LDA Permit will be inspected at the start of land disturbing activities and on a regular basis until the site is stabilized. Subsequent inspections during the construction process will be prioritized as follows:

- Evidence of poor housekeeping
- History of poor compliance
- Evidence of absent or malfunctioning controls
- Proximity to local waterways

Additionally, follow-up inspections by City representatives will take place to verify that corrective measures have been taken for previously documented deficiencies. A final inspection will be conducted at LDA Permit sites after land disturbing activities have ceased to ensure that the site has been adequately stabilized and that excess materials have been removed.

An E&S Inspection Checklist will be completed during inspections. This checklist is important to document the inspection history and the record of compliance. The E&S Inspector will issue a Notice of Violation and/or Stop Work Order (depending upon the severity of the problem) if the site is found in non-compliance. A database of inspections, violations and enforcement actions are maintained by the Public Works Department in association with the Community Development Department database. A copy of the Plan Review checklist is included in Appendix D.

4.3.2. Measurable Goals

- Inspect 100% of active development sites with ongoing land disturbance activities in accordance at a minimum of one time per permit period.
- Document inspection history and the records of compliance after land disturbing activities commence.
- Maintain database of inspections, violations and enforcement actions taken.

4.3.3. Schedule

- Ongoing, 2019 – 2024

4.3.4. Items to be Included in Annual Report

- A list of active construction sites in the reporting period.
- Summary of inspection history and the records of compliance after land disturbing activities commence in the reporting period.

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4.4. ENFORCEMENT PROCEDURES

4.4.1. Description

The City will implement enforcement procedures for E&S violations documented at construction sites in accordance with the E&S Ordinance included in Article 9 of the UNICODE located in Appendix B. The City's E&S Ordinance specifically includes an escalating series of enforcement mechanisms available to the City staff, which are outlined in the City's ERP located in Appendix F.

4.4.2. Measurable Goals

- Enforcement will be taken on 100% of noted violations.

4.4.3. Schedule

- Ongoing, 2019 -2024

4.4.4. Items to be Included in the Annual Report

- Documentation of any notifications made to EPD regarding potential violations.
- Summary of inspections, violations and enforcement actions maintained by the Public Works Department.

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4.5. EDUCATIONAL/TRAINING ACTIVITIES

4.5.1. Description

GESA requires all local government employees involved with plan review, site inspections, or E&S Ordinance enforcement, as well as construction site operators to undergo the applicable training seminars developed by the GSWCC. The City staff are required to receive this training and certification. The City also requires construction site operators to maintain documentation on-site that they have received the appropriate certification.

4.5.2. Measurable Goals

- Train and certify MS4 staff involved in construction activities subject to the Construction General Permits (CGPs) through the training seminars offered by the Georgia Soil and Water Conservation Commission.
- Ensure 100% of construction site operators will have applicable E&S certifications.

4.5.3. Schedule

- Ongoing 2019 - 2024

4.5.4. Items to be Included in the Annual Report

- Summary of the training attended during the reporting period.
- Copies of certification cards, printouts from the GSWCC, or copies of training certificates, etc.

5. HIGHLY VISIBLE POLLUTION SOURCES (HVPS)

Permit Section 3.3.5: Highly Visible Pollution Sources, Table 3.3.5

5.1. HVPS FACILITY INVENTORY

5.1.1. Description

The City maintains an inventory of commercial businesses and facilities that are considered to be highly visible pollutant sources (HVPS). A copy of the HVPS inventory is included in Appendix C. Based on the types of facilities and results of HVPS inspections conducted over the previous permit cycle, the City considers the following types of businesses to be HVPS:

- Landscape and Garden Related Businesses
- Automotive Repair and Car Washes
- Building Contractors with Construction Yards
- Retail Stores and Gas Stations
- Pet Grooming/Kennels

The inventory is updated annually based on changes to the business license database, and will be included in each annual report. The City reserves the right to add additional facilities that do not fall within any of the “HVPS categories” above that demonstrate the potential to pollute stormwater..

5.1.2. Measurable Goals

- Update the HVPS Inventory on an annual basis.

5.1.3. Schedule

- Annual, 2019 – 2024: Update HVPS Inventory.

5.1.4. Items to be Included in Annual Report

- Updated HVPS Inventory.

5.2. HVPS STORMWATER INSPECTION PROGRAM

5.2.1. Description

The City will conduct stormwater inspections at facilities listed on the most updated HVPS inventory list such that 100% of facilities are inspected over the permit period (2019 – 2024), with a minimum of 5% of the facilities inspected annually.

A City inspector, or qualified authority designated by the City, will visit the HVPS site and assess the condition and presence of pollutants at the site. An HVPS Inspection Program Checklist, included in Appendix D, will be used to record the inspection results. City staff will inspect the site for evidence of stormwater pollution in the following areas, if applicable, and this information will be noted:

- Areas around machinery and/or equipment
- Areas prone to leaks and spills
- Outdoor storage and handling areas
- Waste generation, storage, treatment and disposal areas
- Vehicle wash-down areas
- Fueling areas
- Loading and unloading areas

Documentation shall be maintained on all inspections, violations and enforcement actions taken.

5.2.2. Measurable Goals

- Inspect 100% of HVPS sites within the permit period, with at least 5% inspected in any given year.
- Maintain database of inspections, violations and enforcement actions taken.

5.2.3. Schedule

- 2019 – 2024: Inspect 100% of HVPS sites, with a minimum of 5% of the facilities inspected annually.

5.2.4. Items to be Included in the Annual Report

- Provide the total number of HVPS facilities and the number and percentage of inspections conducted during the reporting period.
- Provide a completed checklist and follow-up documentation, if applicable, for each inspected HVPS site conducted that reporting period.

5.3. ENFORCEMENT PROCEDURES

5.3.1. Description

If upon inspection, an HVPS site is found to have issues that would be considered an illicit discharge, then the City will initiate investigative and enforcement actions as outlined in the IDDE Plan and/or the ERP. If an illicit discharge has not taken place but practices onsite indicate a high probability that such a discharge could occur, then the City will discuss with the property owner and/or the operator of the site the issues uncovered by the inspection and provide them with a copy of the inspection checklist. Generally, the City will attempt to notify property owners / operators within 10 business days of the initial inspection, if not sooner, if issues are discovered. The City may re-inspect the site within 1 year to determine if corrective actions have been taken, depending on the severity of the identified issues and whether the City determines a re-inspection is necessary.

For violations that continue unabated, the City will implement the enforcement provisions of the IDDE Plan and the ERP, including issuing violations, sending notifications, and taking enforcing measures necessary to abate the violation and/or restore the property.

5.3.2. Measurable Goal(s)

- Implement enforcement procedures for violations noted during HVPS inspections, as specified in the ERP.
- Notify property owners / operators within 10 business days of the initial inspection if issues are discovered.

5.3.3. Schedule

- Ongoing, 2019 – 2024: Take enforcement actions, as needed and appropriate.

5.3.4. Items to be included in Annual Report

- Documentation of enforcement actions taken on HVPS sites during the reporting period.

5.4. EDUCATIONAL ACTIVITIES

5.4.1. Description

The City will provide employee training for all new and existing employees who work with the HVPS Program. This training program may address topics such as the following: NPDES Regulations and Requirements; Spill Prevention and Response; Good Housekeeping; Materials Handling and Storage; and other stormwater pollution prevention and watershed protection topics. Training sessions will take place annually as the budget allows, and a record of employees attending the training will be maintained.

City staff will also have a face-to-face meeting, when possible, with the manager or employee during or immediately following the inspection to provide information and tips on pollution prevention control measures at their facility. The City staff will also distribute educational materials during HVPS inspections, as appropriate.

5.4.2. Measurable Goal(s)

- Review HVPS brochures on an annual basis.
- Provide annual training sessions for employees who are involved with SWMP implementation.
- Distribute HVPS educational material during facility inspections, as appropriate.

5.4.3. Schedule

- Annual, 2019 – 2024: Meet with manager of facility during HVPS inspections and distribute educational materials.

5.4.4. Items to be included in Annual Report

- Copy of HVPS educational materials distributed during HVPS inspections.
- Training Sign-in Sheet

6. ENFORCEMENT RESPONSE PLAN (ERP)

Permit Section 3.3.6: Enforcement Response Plan (ERP)

6.1. ERP IMPLEMENTATION

6.1.1. Description

The City of Powder Springs has developed and will continue to implement the City's Enforcement Response Plan ERP, which includes the ordinances providing legal authority, types of enforcement mechanisms available, escalation of enforcement, timeframes for investigation, and the method to be used to track instances of non-compliance. The ERP, included in Appendix F, was approved by EPD on September 16, 2013. The City will review the ERP annually and revise it as necessary. If the ERP is revised, the City will submit it to EPD for review.

6.1.2. Measurable Goal(s)

- Annually review the ERP.

6.1.3. Schedule

- Ongoing, 2019 – 2024: Take enforcement actions, as needed and appropriate.
- Annual, 2019 – 2024: Update ERP, if necessary.

6.1.4. Items to be included in Annual Report

- The revised ERP, if updates were completed during the reporting period.

7. MONITORING FOR DISCHARGES TO IMPAIRED WATER BODIES

Permit Section 3.3.7: Impaired Waterbodies

The City currently has no MS4 outfalls discharging to any waterways listed on the most recent 305 (b)/303(d) list and is therefore not currently required to submit an Impaired Waters Plan. However, should any of the waterways within the City be listed, or if the City adds MS4 outfalls that discharge to listed waterways, then the City will develop and implement an Impaired Waters Plan (the Plan) to reduce the pollutant of concern (POC) on each impaired segment. The Plan will generally include the following:

- A list of the impaired waters on the current 303(d) listed and the associated POC;
- A map showing the location of impaired waters and all identified MS4 outfalls; located on the impaired waters or within one linear mile upstream of the impaired waters;
- BMPs that will be implemented to address the POCs;
- A schedule for implementing the BMPs.

The Plan will be developed and submitted to EPD in the first annual report following the listing or the addition of an applicable MS4 outfall. After the initial IWP is developed and approved, the City will review the 303(d) list annually, and add any new impaired waters to the Plan.

7.1.1. Measurable Goal(s)

- a. Annually review the latest 305(b)/303(d) list and MS4 outfalls to determine if the City is required to develop and implement an Impaired Waters Plan, and submit the Plan to EPD for approval..

7.1.2. Schedule

- Annual, 2019 – 2024: Annually review the latest 305(b)/303(d) list.

7.1.3. Items to be included in Annual Report

- b. None at this time.

8. MUNICIPAL EMPLOYEE TRAINING

Permit Section 3.3.8: Employee Municipal Training

8.1.1. Description

The City of Powder Springs will conduct annual employee training for those employees who work in any municipal facility or function that has the potential to contribute pollutants to the MS4. Alternatively, the City may send employees to an applicable training course. City employees will be trained during each permit period on stormwater topics that are necessary for that employee to do their job, including good housekeeping practices at municipal facilities, IDDE, industrial and HVPS inspections, inspection and maintenance of MS4, green infrastructure/low impact development (GI/LID), pollution prevention procedures, and runoff reduction/quality. The City shall keep records of the training, including topic(s), training date(s), as well as a list of attendees for inclusion in the Annual Report.

8.1.2. Measurable Goals

- Ensure that appropriate City staff obtain the appropriate stormwater education and training annually.

8.1.3. Schedule

- Annual, 2019 – 2024: Conduct/obtain employee training annually.

8.1.4. Items to be included in the Annual Report

- Summary of training conducted or attended during the reporting period; documentation to include topic(s), date(s), and a list of attendees.

9. PUBLIC EDUCATION

Permit Section 3.3.9: Public Education

9.1. STORMWATER WEBSITE

9.1.1. Description

The City of Powder Springs will continue to maintain a Stormwater website that is linked through the City's homepage (<https://www.cityofpowdersprings.org/>) The City's stormwater webpage is located at:

<https://www.cityofpowdersprings.org/394/Stormwater>

The City's stormwater webpage includes information on stormwater runoff, proper stormwater management practices and how to prevent stormwater pollution, public education and participation, a complaint or concern link and telephone number to report illegal dumping, illicit discharges, and other stormwater problems; and proper waste management and disposal practices. Copies of the SWMP and Annual Reports will be posted to the Stormwater website after they are approved by EPD.

The City will promote this website as a part of other public education initiatives. Website updates are conducted annually as more information becomes available about innovative design methodologies, including low impact development, green infrastructure and LEED for New Construction Sustainable Sites. The City will add a "counter" to the website so that it can determine how many visits or "hits" there have been for the stormwater webpage.

9.1.2. Measurable Goals

- Maintain and update website to include applicable and relevant educational materials.
- Update the stormwater website to include a counter to record the number of visits.

9.1.3. Schedule

- Annual, 2019 – 2024: Review and update website educational material as necessary.
- June 15, 2021: Add a counter on the website to record the number of visits.

9.1.4. Items to be Included in Annual Report

- Link to educational information on City's website.
- Screenshot of Stormwater website.
- Number of visits recorded by the website counter, once the City has added the counter

9.2. PUBLIC INFORMATION BROCHURES

9.2.1. Description

The City will distribute brochures designed to educate the public about stormwater pollution prevention and other water resources-related topics at City Hall and during City Events. These brochures may include, but are not limited to, the following topics:

- Stormwater Pollution Prevention
- Public Education and Awareness
- Picking Up After Your Pet
- Proper Handling and Disposal of Hazardous Waste
- Construction BMPs
- Septic System Maintenance
- Flood Information

Brochures will be reviewed on an annual basis and new brochures may be chosen and distributed. Brochures will be restocked as they run out. If available, electronic versions of the brochures will be posted on the website.

9.2.2. Measurable Goals

- Review brochures on an annual basis and update/replace as needed.
- Display brochures and restock as they run out.

9.2.3. Schedule

- Annual, 2019 – 2024: Review brochures and restock brochure distribution points.

9.2.4. Items to be included in Annual Report

- Copies of any brochures distributed during the reporting period. Alternatively, the City may provide a screenshot and/or webpage link to the brochure in the Annual Report.
- Record log of distributed brochures during the year.

9.3. UTILITY BILL INSERT

9.3.1. Description

The City of Powder Springs produces an insert to be included in the monthly utility bills that promotes good stormwater practices and advertises the City's website for public complaints. One insert per year will provide information on stormwater and water resource issues, such as advertising local educational and outreach related opportunities and events, methods for reporting illicit discharges to the City, or other stormwater-relevant messages . The utility bills are directly mailed to City residents.

9.3.2. Measurable Goals

- Produce and distribute Utility Bill insert that includes stormwater and water resources related topics at least once/reporting period.

9.3.3. Schedule

- Annual, 2019 – 2024: Distribute insert with monthly Utility Bill that includes stormwater and water resources related topics.

9.3.4. Items to be included in Annual Report

- Copy of utility bill insert with a stormwater-relevant topic distributed during the reporting period.

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9.4. SOCIAL MEDIA PROGRAM

9.4.1. Description

The City of Powder Springs manages a social media account that addresses and educates the public about issues within Powder Springs such as proper household garbage and recycling efforts, zoning issues, current and future Public Works projects, and advertisements for public education events. Each year, the City will post a stormwater educational message that will include information related to stormwater and water resource issues and prevention practices. The social media posting may also advertise local stormwater educational and outreach related opportunities and events or educate the community about other relevant issues and stormwater pollution prevention techniques that the City feels should be addressed within its community. The City's Social Media platforms include:

Facebook: <https://www.facebook.com/cityofpowdersprings/>

Twitter: <https://twitter.com/powdersprings01?lang=en>

Instagram: https://www.instagram.com/powder_springs/

Example topics that will be addressed within the post may include:

- Link to the City's stormwater webpage
- Proper disposal of household hazardous waste
- Reporting mechanisms for citizens to report water quality violations and illicit discharges
- Proper application, storage, and disposal of landscape chemicals
- Impacts of stormwater pollution
- Tips for stormwater pollution prevention.
- Picking Up After Your Pet
- Septic System Maintenance
- Promotion of Public Involvement Activities

9.4.2. Measurable Goals

- Produce Social Media post at least once/reporting year that includes a stormwater and water resources related topic.

9.4.3. Schedule

- Annual, 2019 – 2024: Post a stormwater and water resources related topics, once per year on one of the City's Social Media accounts.

9.4.4. Items to be included in Annual Report

- Summary of and/or copy of stormwater and water resources topic posted on social media during the reporting period.
- Date of the stormwater-related posting to social media.

10. PUBLIC INVOLVEMENT

Permit Section 3.3.10: Public Involvement

10.1. PUBLIC INPUT ON SWMP

10.1.1. Description

The City of Powder Springs will invite the public to provide input on the SWMP and engage as community stakeholders by posting this document as well as the Annual Report on the City's Stormwater website.

<https://www.cityofpowdersprings.org/397/NPDES>

The website will contain a link that will allow the public to submit comments to the City on the best management practices included within the SWMP as well as on the activities summarized in the Annual Report. These documents will be posted after they are approved by EPD.

10.1.2. Measurable Goals

- Post the City's most recent SWMP update on the website after its approval by EPD.
- Post each Annual Report on the website after its approval by EPD.

10.1.3. Schedule

- Annual, 2019 – 2024: Post Annual Report and most recent SWMP Update.

10.1.4. Items to be Included in Annual Report

- Copy of or summary of comments received by the City on the SWMP or Annual Report and a description of how they were addressed.

10.2. PUBLIC COMPLAINT AND REPORTING PROCEDURES

10.2.1. Description

The City of Powder Springs has established procedures for encouraging and addressing citizen complaints about water quality and reports of illicit discharges/illegal dumping. Complaints can be made through the City's official stormwater website that allows for citizens and visitors to report concerns, including illicit discharges and illegal dumping. The link to this page can be found on the City's homepage at:

<https://www.cityofpowdersprings.org/522/Report-Drainage-Problems-or-Illicit-Disc>

This website also provides a link and a phone number (770) 943-8010 for City residents to contact the City for any purpose, including to report illicit discharges or illegal dumping in the storm sewer system as well as an after-hours phone number (770) 943-8010 for reporting illicit discharges outside of City hours. Information received through the website will be referred to the appropriate department. The City promotes this website as a part of other public education initiatives (City water bill and Stormwater website).

City administrative staff are responsible for receiving citizen complaint calls, and using the caller's information to generate a work order. The work order is then passed to the Public Works Department, which is responsible for taking action to address calls that relate to water quality within three (3) business days. The Public Works staff will record actions taken to address the complaint in the work order and maintain a database of all finished work orders related to potential illicit discharges, illegal dumping, and other water quality violations. The Public Works Department maintains a database of all finished work orders and provides monthly reports to Council.

10.2.2. Measurable Goals

- Promote phone number and City of Powder Spring's website to encourage the public to report illicit discharges/illegal dumping in the storm sewer system.
- Perform at least one notification per reporting period to inform the public on methods to report an observed illicit discharge.
- Investigate 100% of all water quality complaints received within three (3) business days and take appropriate action for 100% of complaints requiring action.
- Record IDDE complaints and actions taken in the City's Work Order Database.

10.2.3. Schedule

- Annual, 2019 – 2024: Perform at least one notification per reporting period to inform the public on methods to report an observed illicit discharge.
- Ongoing, 2019 – 2024: Update Work Order Database as calls are received and record/take action for complaints received, as appropriate.

10.2.4. Items to be included in the Annual Report

- Copy of formal notification used to inform the public on methods to report an observed illicit discharge or illegal dumping in the storm sewer system

Summary from the Work Order Database, including documentation of citizen complaints, investigations, and actions taken during the reporting period.

DRAFT

10.3. TRASH PICK-UP EVENT IN POWDER SPRINGS

10.3.1. Description

The City of Powder Springs will work with local groups to conduct one clean-up event (Pick It Up Powder Springs) each year within the City to remove trash left near the curb. All debris and trash will be properly recycled and/or disposed of and the City will keep documentation of trash disposal. the City will also keep records of the number of volunteers that participate in the event.

10.3.2. Measurable Goals

- Hold one clean-up event per year within the City of Powder Springs.

10.3.3. Schedule

- Annual, 2019 – 2024: Hold one clean-up event per year.

10.3.4. Items to be Included in Annual Report

- Records of the number of volunteers that participated.
- Documentation of waste disposal collection or disposal activities. This may include information such as the number of bags of trash collected, landfill receipts, or other relevant documentation.

DRAFT

10.4. RESIDE WITH PRIDE CLEANUP EVENT IN POWDER SPRINGS

10.4.1. Description

The City of Powder Springs will work with the Sanitation Department to conduct one clean-up event each year within the City to remove trash and litter from the City ROW. The event will be advertised, such as on the City social media account and/or with promotional kiosk signs or other appropriate advertisement methods. The City will keep records of the number of volunteers that participate in the event as well as documentation of waste disposal activities.

10.4.2. Measurable Goals

- Hold one clean-up event per year within the City of Powder Springs.
- Record number of volunteers
- Document waste collection and disposal activities.

10.4.3. Schedule

- Annual, 2019 – 2024: Hold one clean-up event per year.

10.4.4. Items to be Included in Annual Report

- Records of the number of volunteers that participated.
- Number of bags of trash collected

11. POST CONSTRUCTION

Permit Section 3.3.11: Post-Construction

11.1. POST-CONSTRUCTION STORMWATER CONTROLS

11.1.1. Description

The City of Powder Springs has adopted stormwater runoff controls for new development in Article 11 of the Stormwater Management Ordinance. The performance standards within this ordinance are consistent with the GSMM and the City's NPDES Phase I MS4 Permit. The Stormwater Management Ordinance details the rules and regulations governing post-development stormwater management practices for new development and redevelopment. The regulations require performance standards consistent with Section 3.3.11(a)(2) of the Permit for all developments and redevelopments adding or replacing more than 5,000 square feet of impervious surface. This ordinance also requires developments to utilize the standards, criteria, and information presented in the latest edition of the GSMM, and any relevant local addenda, for the proper implementation of this ordinance.

The City will apply their adopted performance standards during the design of City-construction projects, with the possible exception of linear projects. If the City designs a linear construction project, for which it would be impossible to apply the performance standards, the City will develop a feasibility program which sets reasonable criteria for determining when implementing performance standards for linear projects is infeasible. This will be submitted to EPD, and applied to future linear construction projects only upon approval.

The Atlanta Regional Commission has updated the GSMM to better address stormwater runoff volume as well as quality and rate through the use of infiltration and green infrastructure techniques. These performance standards must be considered during the site plan preparation and/or review process. Currently, the City has the option to capture and treat stormwater by removing 80% of the average annual post-development total suspended solid (TSS) load or equivalent. By December 10, 2020, the City will need to revise the Stormwater Management Ordinance by adopting performance standards that require stormwater management systems to retain the first 1.0 inch of rainfall on the site, to the maximum extent practicable. If the City determines this is infeasible, this must be documented in plan review documents and the remaining runoff from a 1.2 inch rainfall event must be treated to remove at least 80% of the average TSS load or equivalent. The City has the option to adopt this performance standard, and amend its Stormwater Management Ordinance, prior to December 10, 2020.

11.1.2. Measurable Goal

- Annually evaluate the Stormwater Management Ordinance for post construction stormwater runoff requirements to determine if revisions are required and update the Ordinance accordingly.

- Enforce the use of the Stormwater Management Ordinance, related to post construction stormwater management, for development that meets the standards above.
- If needed, develop linear project feasibility program to apply to future linear projects.
- Revise the Stormwater Management Ordinance to adopt the required performance standard designed to treat and retain stormwater onsite in accordance with Permit Section 3.3.11(a)(2) by December 10, 2020.

11.1.3. Schedule

- December 10, 2020: Update the Stormwater Management Ordinance and adopt the required performance standard.
- Ongoing, 2019 – 2024: Enforce the use of the Stormwater Management Ordinance during plan review.
- Annual, 2021 – 2024: Review of Stormwater Management Ordinance, related to post construction stormwater management.
- If needed, develop linear project feasibility program, and submit to EPD for approval.

11.1.4. Items to be included in Annual Report

- Number of post construction stormwater runoff plans reviewed and approved during the reporting period.
- A copy of the Stormwater Management Ordinance, if revised during the reporting period.
- If developed, linear project feasibility program.

11.2. GREEN INFRASTRUCTURE/LOW IMPACT DEVELOPMENT (GI/LID)

Permit Section 3.3.11: Post-Construction, Table 3.3.11(b)(2)

11.2.1. Legal Authority and Ordinance Review

11.2.1.A. Description

The City will continue to review and revise, where necessary, building codes, ordinances, and other regulations to ensure they do not prohibit or impeded the use of GI/LID practices, including infiltration, reuse, and evapotranspiration. The City will assess those regulations governing residential and commercial development, road design, land use, and parking requirements. During the regulatory review, the City may consider the inclusion of incentives for use of GI/LID practices into the ordinances.

The City will conduct inspections and/or ensure inspections are conducted on 100% of inventoried GI/LID structures in accordance with the inspection schedule set forth in the City's GI/LID Program. Maintenance will be conducted as needed on City-owned structures, and the City will implement maintenance procedures for inventoried structures that are not owned by the City in accordance with the GI/LID Program. The City's GI/LID Program is located in Appendix G.

11.2.1.B. Measurable Goals

- Review City ordinances, building codes, and other regulations annually to ensure they do not impede GI/LID approaches.

11.2.1.C. Schedule

- Annual, 2019 – 2024: Review City ordinances, building codes, and other regulations related to impeding GI/LID approaches.

11.2.1.D. Items to be Included in Annual Report

- If updates to the City's ordinances, building codes, or other regulations are made to facilitate GI/LID practices during the reporting period, copies of the updated ordinance and/or code(s) will be included.

11.2.2. GI/LID Program

11.2.2.A. Description

The City of Powder Springs has developed and implemented a GI/LID Plan to address the following elements of the City's GI/LID program:

1. GI/LID techniques and practices
2. GI/LID structure inventory
3. GI/LID inspection and maintenance program

A copy of the GI/LID Program is included in Appendix G. The City will annually review the GI/LID Program and make changes as needed.

11.2.2.B. Measurable Goals

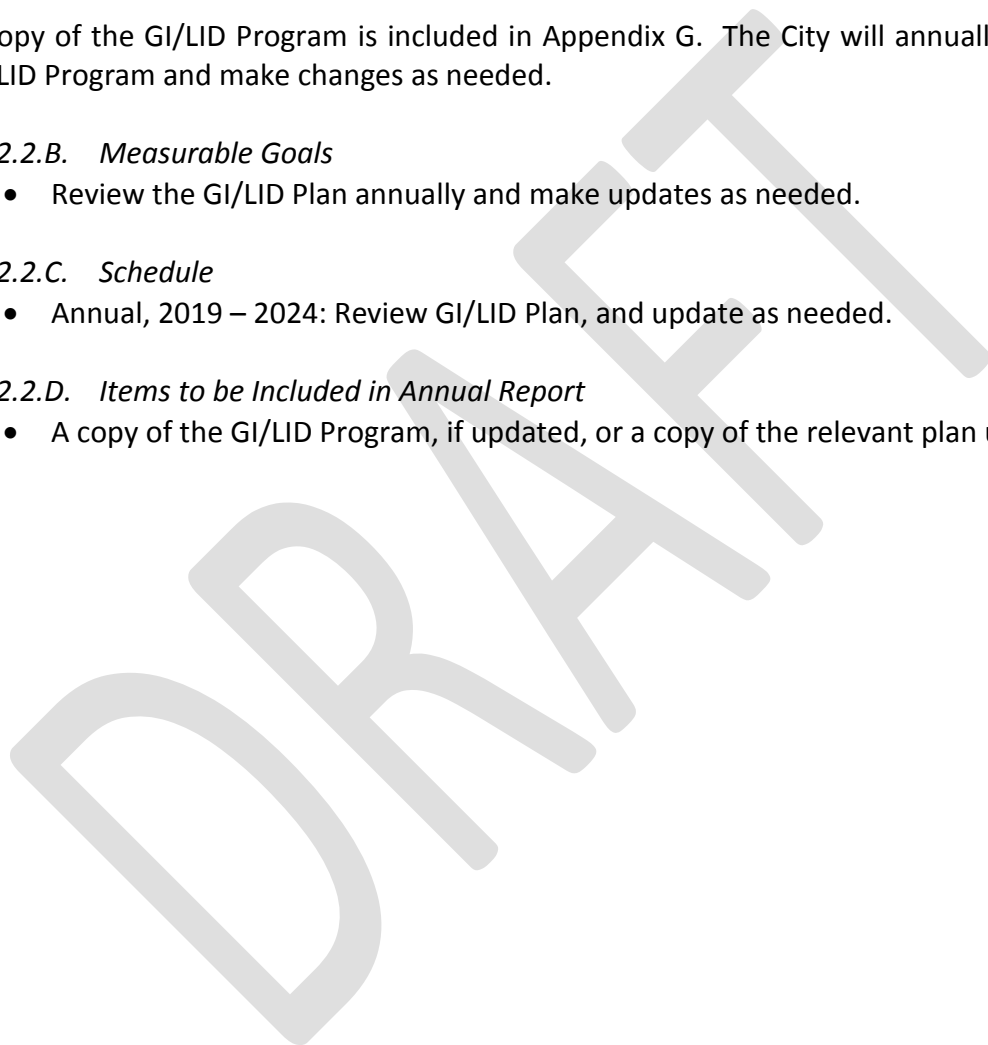
- Review the GI/LID Plan annually and make updates as needed.

11.2.2.C. Schedule

- Annual, 2019 – 2024: Review GI/LID Plan, and update as needed.

11.2.2.D. Items to be Included in Annual Report

- A copy of the GI/LID Program, if updated, or a copy of the relevant plan updates.



11.2.3. GI/LID Structure Inventory

11.2.3.A. Description

The City maintains an inventory of privately-owned non-residential and publicly-owned water quality-related Green Infrastructure (GI) / Low Impact Development (LID) structures located within the City of Powder Springs. The inventory will include at a minimum: bioswales, permeable pavement, rain gardens, bioretention, cisterns, green roofs, and any other structure deemed appropriate by the City. The inventory will be reported in a table format that will include the following information:

- Type of Structure
- Location of Structure (Latitude & Longitude)
- Date Constructed

In addition to the type and location of each structure, the table will also include a summary of the total number of each structure. New GI/LID structures will be identified through the plan review process and added to the inventory. An updated inventory will be included with each annual report.

11.2.3.B. Measurable Goals

- Update the inventory with new GI/LID structures and submit the updated inventory in each annual report.

11.2.3.C. Schedule

- Annual, 2019 – 2024: Update GI/LID structure inventory.

11.2.3.D. Items to be included in Annual Report

- Most recent GI/LID Inventory.

11.2.4. Inspection and Maintenance Program

11.2.4.A. Description

The City has developed a program to ensure that inspections are conducted on 100% of the privately-owned non-residential and publicly-owned GI/LID structures within a 5-year period in accordance with the inspection schedule set forth in the City's GI/LID Program, included in Appendix G.

Maintenance will be conducted as needed on City-owned structures, and the City will implement maintenance procedures for inventoried structures that are not owned by the City in accordance with the GI/LID Program.

The City requires developers of privately-owned non-residential GI/LID structures to complete an Inspection & Maintenance Agreement with the City, prior to the issuance of a permit for any land development activity. During routine inspections, if the City staff determine that the owner is not properly maintaining their non-residential GI/LID structures, they will enforce the provisions of the Inspection & Maintenance Agreement and the Stormwater Management Ordinance.

11.2.4.B. Measurable Goals

- Inspect 100% of the privately-owned non-residential and publicly-owned GI/LID structures within a five-year period. Provide the number and/or percentage of the total structures inspected during the reporting period in each annual report.
- Ensure that private owners are maintaining privately-owned non-residential GI/LID structures in accordance with their Inspection & Maintenance Agreements.
- Conduct maintenance on all publicly owned GI/LID structures, in accordance with the procedures included in the GI/LID Program.

11.2.4.C. Schedule

- 2019 – 2024: Inspect 100% of non-residential GI/LID structures, with a minimum of 5% of the structures inspected annually.
- 2019 – 2024: Inspect and maintain 100% of publicly-owned GI/LID structures, with a minimum of 5% of the structures inspected and maintained annually.

11.2.4.D. Items to be Included in Annual Report

- Number and percentage of GI/LID structures inspected during the reporting period.
- Number and percentage of publicly-owned GI/LID structures inspected and maintained during the reporting period.
- Copies of any Inspection & Maintenance Agreements executed during the permit period.