MINIMUM CONTROL MEASURE A
PUBLIC EDUCATION AND OUTREACH PROGRAM

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

The following Best Management Practices are included as part of this Minimum Control Measure:

- BMP #1 - Informational Display
- BMP #2 - Stormwater Webpage
- BMP #3 - Stormwater Program Annual Update Mailer

A. Best Management Practice (BMP) #1 – Informational Display

1. Target Audience: General Public

2. Description of BMP:
The City's Engineering Department, Building Department, City Hall and the Public Library are consolidated into one public facility. The facility is located adjacent to a public park and large lake that is a focal point of the community. As such, the City has established and maintains an informational display in the library lobby that contains a variety of Clean Water Campaign educational brochures related to stormwater management, water quality and water resources. A variety of educational brochures are maintained so that the public may select brochures that are of a particular or personal interest.

3. Measurable Goals:
   a. Replenish educational brochures in display
   b. Review and update educational brochures in display
   c. Track numbers of educational brochures picked up by the public and report in annual report

4. Documentation to be submitted with each annual report: Educational brochure tracking log, statement of brochures offered in display

5. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Replenish brochures – Semi-Annually
      ii. Review and update brochures – Annually
      iii. Track numbers of brochures picked up and report in annual report - Annually

   c. Month/Year of each action:
      i. June & Dec: 2013, 2014, 2015, 2016, 2017 – Replenish brochures
      ii. Dec: 2013, 2014, 2015, 2016, 2017 – Review and update brochures

6. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

7. Rationale for choosing BMP and setting measurable goal(s):
   The proximity of the public facilities to the park and lake as well as the heavy use of City Hall by the public will ensure that the display is heavily visited.

8. Determination of BMP effectiveness in reducing pollution to stormwater:
   By recording the number of brochures picked up by public annually, the City can conclude that the public is willing to educate themselves about stormwater pollution, water quality and pollution reduction.

-END-

B. Best Management Practice (BMP) 2 – Stormwater Webpage

1. Target Audience: General Public

2. Description of BMP:
The City maintains a website for disseminating information to the public. Included on the City's website is a stormwater management webpage that can be accessed at *http://www.peachtree-city.org/index.aspx?nid=159*. The stormwater webpage includes information about the City's Stormwater Management Program, the City's Stormwater Utility, tips for lawn and garden activities, water conservation, proper disposal of household wastes, household recycling, septic tank maintenance, hazards of illegal discharge and dumping, and other stormwater related information.

3. Measurable Goals:
   a. Update stormwater web page
   b. Track webpage 'hits' and report in annual report
   c. Advertise webpage existence in stormwater program annual update mailer (see MCM B BMP #3)

4. Documentation to be submitted with each annual report:
Screenshot of updated webpage, statement of annual webpage hits

5. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Update webpage – Annually
      ii. Track webpage 'hits' - Annually

   c. Month/Year of each action:
      i. Jun 2013, 2014, 2015, 2016, 2017 – Update webpage
      ii. 2013, 2014, 2015, 2016, 2017 – Track 'hits'

6. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager); Tony Whitley (IT Manager)

7. Rationale for choosing BMP and setting measurable goal(s):
The City believes that a high portion of the population either owns or has access to a computer with Internet access. As such, a stormwater page on the City's official website provides an easily accessible source of information that residents and the general

public can access to educate themselves on stormwater management and other water quality issues.

8. Determination of BMP effectiveness in reducing pollution to stormwater:
By tracking the number of hits to the City's stormwater webpage, the City is able to document webpage usage. If webpage usage is consistent from year to year or increases from one year to the next, the City can conclude that this BMP is effective in reducing pollution to stormwater.

-END-

C. Best Management Practice (BMP) #3 – Stormwater Program Annual Update Mailer

1. Target Audience: Stormwater Utility Customers / General Public

2. Description of BMP:
   The City will continue to prepare a stormwater program annual update mailer that includes information on the current status of the City's stormwater management program, a description of various accomplishments of the program during the previous year as well as anticipated stormwater related activities for the coming year. In order to insure the widest spread of dissemination to the citizens, the City will include the update mailer with the mailing of our annual stormwater utility bill that is sent to all residential and commercial customers.

3. Measurable Goals:
   a. Prepare and mail a stormwater program update to all recipients of a stormwater utility bill.

4. Documentation to be submitted with each annual report: Copy of annual update mailer

5. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Prepare program update mailer – Annually
      ii. Mail program update mailer – Annually

   c. Month/Year of each action:
      i. Jan: 2013, 2014, 2015, 2016, 2017 – Prepare program update mailer
      ii. March: 2013, 2014, 2015, 2016, 2017 – Mail program update mailer with stormwater utility bill

6. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

7. Rationale for choosing BMP and setting measurable goal(s):
   The City currently has over 12,000 Stormwater Utility customers. Performing this stormwater related educational information dissemination as part of the utility bill distribution is a very effective way to reach a broader audience.

8. Determination of BMP effectiveness in reducing pollution to stormwater:
   By ensuring that the annual update mailer is sent to 100% of the City's stormwater utility customers, the City can conclude that this BMP is effective in reducing pollution to stormwater.

-END-

MINIMUM CONTROL MEASURE B
PUBLIC INVOLVEMENT/PARTICIPATION

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

The following Best Management Practices are included as part of this Minimum Control Measure:

- BMP #1 – Adopt-A-Mile, Adopt-A-Path, Adopt-A-Park, Adopt-A-Stream
- BMP #2 – Spring Cleanup

A. Best Management Practice (BMP) #1 – Adopt-A-Mile, Adopt-A-Path, Adopt-A-Park and Adopt-A-Stream

1. Target Audience: General Public

2. Description of BMP:
The City currently operates Adopt-A-Mile, Adopt-A-Path, and Adopt-A-Park programs to encourage volunteer groups to pick up trash along major roadways, cart paths and in parks within the City. The City solicits volunteer participation in these programs by advertising the programs on the City website. In addition, citizens are offered a 25% credit towards their Stormwater Utility Bill for participating in these programs. Groups are asked to commit to cleaning up their adopted area four times a year. The City provides the roadside signage, vests and trash bags for volunteer groups. The public works department accepts and properly disposes of all waste collected by these groups. In addition, the City also supports the McIntosh High School Adopt-A-Stream program by annually providing the program with the sampling supplies and educational materials for dissemination to the public.

3. Measurable Goals:
   a. Include and update information about the Adopt-A programs on the City's website
   b. Record number of groups, volunteers, volumes collected and cleaning events annually and include in annual report
   c. Provides supplies to McIntosh High School Adopt-A-Stream program

4. Documentation to be submitted with each annual report: Adopt – A-Program volunteer lists, tabulation of materials collected by each group, screenshot of website information

5. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of Actions:
      i. Report number of groups, volunteers, volumes collected and events – Annually
      ii. Update information on website – Annually
      iii. Provide supplies for the McIntosh High School Adopt-A-Stream program – Annually

   c. Month/Year of each action:
      i. Dec: 2013, 2014, 2015, 2016, 2017 – Report number of groups, volunteers, and cleanup events

ii. Mar: 2013, 2014, 2015, 2016, 2017 – Include/update information on program on website

iii. May: 2013, 2014, 2015, 2016, 2017 – Provide supplies for the McIntosh High School AAS program as requested

6. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager); Al Yogul (Keep Peachtree City Beautiful)

7. Rationale for choosing BMP and setting measurable goal(s):
Routinely picking up trash and debris will prevent it from entering the MS4. Soliciting and encouraging volunteer participation also allows citizens to become involved in their own water resources protection. In addition support of the McIntosh High School Adopt-A-Stream program encourages the education and involvement of community students in the protection of our water resources.

8. Determination of BMP effectiveness in reducing pollution to stormwater:
By quantifying and recording the amounts of trash and debris picked up annually, the City can conclude that the trash and debris was prevented from entering the City's MS4 and thereby reducing a contributing factor to stormwater pollution.

-END-

B. Best Management Practice (BMP) #2 – Spring Cleanup

1. Target Audience: General Public

2. Description of BMP:
The City continues to operate an annual spring cleanup event for residents of the City. The event collects various types of household trash such as, but not limited to, old electronic devices, appliances, recyclables, old furniture and other household items that typically cannot be disposed of through curbside trash pickup. The event does not accept tires, batteries or hazardous materials. The event is free to all city residents.

   The event is staffed by public works personnel who assist the residents in unloading the items. Staff then separates the items for disposal in City supplied item specific roll off dumpsters for legal disposal or further recycling. Quantities of specific types of materials are tracked as well as the number of participants (by car load). The event is advertised on the City's website at least one month before the event is held in early May and it is also advertised in the City's electronic monthly update newsletter sent to those residents that have requested the service.

3. Measurable Goals:
   a. Advertise spring cleanup event on city website and in monthly city update newsletter
   b. Hold spring cleanup event
   c. Track and record volumes and types of materials collected and report in annual report

4. Documentation to be submitted with each annual report: Copies of event advertisements, tabulation of materials collected during event

5. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Advertise event - annually
      ii. Hold spring cleanup event - annually
      iii. Record and report quantities of materials collected during event - Annually

   c. Month/Year of each action:
      i. April 2013, 2014, 2015, 2016, 2017 – Advertise event

ii. May 2013, 2014, 2015, 2016, 2017 – Hold spring cleanup event

6. Person (position) responsible for overall management and implementation of the BMP: Michael Rogers (Support Manager), Scott Hicks (Public Works Superintendent)

7. Rational for choosing BMP and setting measurable goals:
Providing the residents of the City with an opportunity to legally dispose of trash and litter can prevent the litter and trash from potentially entering and polluting the City's MS4.

8. Determination of BMP effectiveness in reducing pollution to stormwater:
By quantifying and recording the amounts of trash and debris collected annually by the event, the City can conclude that the trash and debris was potentially prevented from entering and polluting the City's MS4. Hence, this BMP is effective in reducing pollution to stormwater.

-END-

MINIMUM CONTROL MEASURE C
ILLICIT DISCHARGE DETECTION AND ELIMINATION

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

A. Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the state that receive discharges from those outfalls;

B. Effectively prohibit, through ordinance, or other regulatory mechanism, non-stormwater discharges into your storm sewer system and implement appropriate enforcement procedures and actions;

C. Develop and implement a plan to detect and address non-stormwater discharges, including illegal dumping, to your system; and

D. Inform public employees, businesses and the general public of hazards associated with illegal discharges and improper disposal of waste.

The following Best Management Practices are included as part of this Minimum Control Measure:

- BMP #1 – Illicit Discharge Ordinance Review
- BMP #2 – Outfall Mapping and Database
- BMP #3 – Dry Weather Screening Program
- BMP #4 – Source Tracing and Removal Program
- BMP #5 – Illicit Discharge Education Program
- BMP #6 – Citizen Complaint Response
- BMP #7 – Water Quality Sampling Program

A. Best Management Practice (BMP) #1 – Illicit Discharge Ordinance Review

1. Description of BMP:
   The City continues to implement and enforce an Illicit Discharge Ordinance designed to prohibit non stormwater discharges to the City's MS4 and imposes sanctions for failure to comply with the ordinance. On an annual basis, the City will evaluate the Ordinance to determine if modifications are necessary that could potentially strengthen the Ordinance and ensure further compliance.

2. Measurable Goals:
   a. Evaluate the Illicit Discharge Ordinance to determine if revisions are necessary to further ensure compliance
   b. Modify the Illicit Discharge Ordinance as necessary and implement the revisions. Forward a copy of the revised ordinance to EPD.
   c. Report the results of the Ordinance review to EPD in the Annual Report

3. Documentation to be submitted with each annual report: Discussion of ordinance review, copy of revised ordinance when necessary

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Evaluate the Ordinance - Annually
      ii. Modify the Ordinance and implement the revisions – As necessary
      iii. Report Ordinance review results to EPD in Annual Report - Annually

   c. Month/Year of each action:
      i. Dec 2013, 2014, 2015, 2016, 2017– Evaluation of the Illicit Discharge Ordinance

5. Person (position) responsible for overall management and implementation of the BMP: David Borkowski (City Engineer); Michael Madison (Stormwater Project Manager)

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

A regulatory mechanism is necessary to prohibit illicit connection and discharges and to impose sanctions in order to ensure compliance.

. Determination of BMP effectiveness in reducing pollution to stormwater:

Through the process of annually evaluating the Ordinance, revising the Ordinance as necessary and reporting on the results of the evaluation to EPD, the City can ensure that this BMP is effective in reducing pollution to stormwater.

-END-

B. Best Management Practice (BMP) #2 – Outfall Mapping and Database

1. Description of BMP:
   The City has created a map and database of all regulated outfalls in the City. Each year, the City will update the map 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 outfall map has been included in Attachment C

2. Measurable Goals:
   a. Maintain a map and database of all MS4 outfalls

3. Documentation to be submitted with each annual report: Updated outfall map, updated outfall database

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Map and database update - Annually

   c. Month/Year of each action:
      i. Dec 2013, 2014, 2015, 2016, 2017– Update MS4 outfall map and database

5. Person (position) responsible for overall management and implementation of the BMP: Tony Whitley (GIS Coordinator); Michael Madison (Stormwater Project Manager)

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 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.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   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. Hence, this BMP is effective in reducing pollution to stormwater.

-END-

C. Best Management Practice (BMP) #3 – Dry Weather Screening Program

1. Description of BMP:
   The City will continue to implement the dry weather-screening program in the effort to detect and eliminate 100% of all non-stormwater discharges to the City's MS4. The dry weather screening program will utilize the dry weather screening procedures previously submitted to and approved by EPD and will also utilize the approved checklist. A copy of the dry weather screening checklist is included the attachments.

   The City has five major watersheds; Camp Creek, Lake Kedron, Lake Peachtree, Line Creek and Lower Flat Creek. All outfalls within one watershed will be inspected on an annual basis and the watersheds will rotate from one year to the next. This inspection schedule will ensure that all outfalls in the database will be inspected at least once during the five year NPDES Phase II Permit cycle.

   If there is dry weather flow, and if the detected limits of any the sampling parameters are above their acceptable baseline limits as shown in the approved dry weather screening procedures, the City will initiate the source tracing and removal program described in Minimum Control Measure C BMP #4.

2. Measurable Goals:
   a. Annual sampling of chosen outfall monitoring locations
   b. Sample all observed dry weather flows per approved procedures
   c. Initiate source tracing procedures when required in the to eliminate 100% of non-stormwater discharges

3. Documentation to be submitted with each annual report: Dry weather screening sector map, completed dry weather screening checklists

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions: Dry weather screening – Annual

   c. Month/Year of each action:
      i. 2013 – Lower Flat Creek Watershed
      ii. 2014 – Camp Creek and Line Creek Watershed

iii. 2015 – Lake Kedron Watershed
iv. 2016 – Lake Peachtree Watershed (Upper Half)
v. 2017 – Lake Peachtree Watershed (Lower Half)

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
This BMP will utilize City staff to screen drainage outfalls in Peachtree City to identify prohibited activities. This BMP meets specific requirements of the NPDES Phase II MS4 permit.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
The City believes that identifying and eliminating illicit discharges of pollutants will reduce the pollutant loading of the City's streams and rivers. By ensuring that 100% of observed dry weather flows are investigated, this BMP is effective in reducing pollution to stormwater.

-END-

D. Best Management Practice (BMP) #4 – Source Tracing and Removal Procedures

1. Description of BMP:

Should an illicit discharge be detected through the dry weather-screening program, the City will attempt to trace the source and remove the illicit connection. The source-tracing program will involve the potential usage of one or all of the following four elements:

- Visual inspection
- Additional field sampling
- Stormwater inspection
- Dye testing

Upon detection of a potential illicit discharge, City staff will visually inspect upstream of the outfall in question to search for evidence indicating the source of the illicit discharge or illegal dumping. If the upstream search does not provide definitive evidence of the source, then City staff may elect to perform one or all of the following: additional field sampling, dye testing, and/or stormwater inspection.

Additional field sampling may be performed within the conveyance system. Samples will be taken at storm sewer line connections and convergences to determine the source of illicit discharge.

The City may also elect to perform a stormwater site inspection at a facility suspected of having an illicit connection. During inspection, dye testing may be performed to determine if there is a tie in. Potential illegal connections, such as floor drains, will be investigated as part of this inspection process.

Dye testing may be performed if the suspected illicit connection is likely to be an illegal sanitary sewer line tie-in, i.e. sampling revealed high levels of fecal coliform, detergent, or high conductivity. In dye testing, non-toxic fluorescent dye is flushed down a toilet or sink, and if the dye appears in the storm sewer system, then an illegal tie in is confirmed.

If the suspected illicit discharge is a sanitary sewer tie in, and all other methods offer no clues, Peachtree City may contract with the Peachtree Water and Sewer Authority or a private contract to perform either line televising or smoke testing.

Upon identification of a source of illicit discharge, it will be the Peachtree City Code Enforcement Officer's responsibility to enforce the Illicit Discharge Ordinance. These regulations give the City the authority to require parties illegally discharging to the MS4 to remove the illicit connection as well as penalize violators of the ordinance.

2. Measurable Goals:
   a. 100% of suspected illicit discharges investigated
   b. 100% of identified illicit connections removed

3. Documentation to be submitted with each annual report: Discussion of source tracing events, photographs when necessary, copies of laboratory analysis when necessary, copies of any issued citations when necessary

4. Schedule:

   a. Implementation Date: Jan 2013

   b. Frequency of actions: All suspected illicit discharges will be investigated

   c. Month/Year of each action:
      i. Ongoing 2013, 2014, 2015, 2016, 2017 – Source tracing of all illicit discharge detections

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

6. Rational for choosing BMP and setting measurable goals:
   NPDES MS4 Phase II regulations require local governments to trace and eliminate the source of illicit discharge into the MS4. By locating, tracing, and eliminating illicit connections, the City will protect water quality in the MS4 and local waterways into which the MS4 discharges.

7. Determination of BMP effectiveness in reducing pollution to stormwater
   The City believes that locating and removing illicit connections can improve water quality. By ensuring that 100% of illicit discharges are investigated and eliminated, the City can ensure that this BMP is effective in reducing pollution to stormwater.

-END-

E. Best Management Practice (BMP) #5 – Illicit Discharge Education Program

1. Description of BMP:
   The City's Stormwater Utility currently has in excess of 12,000 customers. The customer base is very diverse and includes residential, commercial, retail, institutional and industrial customers. On an annual basis, the City prepares an update mailer (See Minimum Control Measure A, BMP #3) that includes information on the current status of the City's stormwater management program and sends a copy to each utility customer.

   In order to ensure that the customer base is educated on the subject of illicit discharges, the City will devote a section of the annual mailer to illicit discharges. Illicit discharge related topics that will be discussed in the annual mailer will include providing a definition of illicit discharge, making customers aware that illicit discharges violate city ordinances and advising customers that illicit discharges can degrade water quality.

2. Measurable Goals:
   a. Revise stormwater annual mailer format to include discussion on illicit discharges.
   b. Distribute mailer to 100% of utility customers

3. Documentation to be submitted with annual report: Stormwater annual update mailer

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Prepare mailer with illicit discharge discussion – Annually
      ii. Distribute mailer to 100% of utility customers - annually

   c. Month/Year of each action:
      i. Jan: 2013, 2014, 2015, 2016, 2017 – Prepare program update mailer
      ii. March: 2013, 2014, 2015, 2016, 2017 – Mail program update mailer with stormwater utility bill

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Project Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
The City currently has over 12,000 Stormwater Utility customers. Performing this stormwater related educational information dissemination as part of the utility bill distribution is a very effective way to reach a broader audience.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
By ensuring that 100% of utility customers receive the annual mailer containing information about illicit discharges, the City can ensure that this BMP is effective in reducing pollution to stormwater.

-END-

F. Best Management Practice (BMP) #6 – Citizen Complaint Response

1. Description of BMP:
   The City has created a citizen compliant contact number so citizens can report potential illicit discharge violations and water quality issues. The complaint calls are answered by a City staff member who forwards the complaint to the appropriate City department. If necessary, the complaint will be forwarded to the appropriate State or Federal department (if it is not within the City's jurisdiction). The date, time, location, and nature of the complaint as well as any other pertinent information is logged into an electronic database. In addition to the complaint phone number, residents can also file an electronic complaint via an online complaint form located on the City's webpage.

   Once the call or online complaint has been forwarded to the appropriate department, City staff within that department is responsible for investigating the complaint and taking any appropriate action including enforcement if necessary. Any complaint resolution actions taken are also entered into the same database.

   The complaint contact number and online complaint form is publicized on the City's website, the stormwater management webpage and the public works webpage.

2. Measurable Goals:
   a. Continuous update of complaint database
   b. City staff addresses 100% of calls received
   c. City staff investigates 100% of reasonable calls within five working days
   d. City staff takes appropriate action for 100% of complaints that require it
   e. Report number of complaints received and status of complaint in annual report

3. Documentation to be submitted with annual report: Complaint database, copies of work orders generated by specific complaints, screenshot of website complaint form

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Database update – As calls are received
      ii. Complaint investigation – As calls are received

iii. Report number of complaints received and status of complaint in annual report - Annually

c. Month/Year of each action:
   i. Ongoing: 2013, 2014, 2015, 2016, 2017 – Investigation of complaints

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

6. Rational for choosing BMP and setting measurable goals:
The citizen complaint contact number and online complaint form provide a way for City, residents to be an "auxiliary" inspection force ensuring that potential water quality violations are being investigated. This BMP is also intended to engage citizens in local water resources protection thereby educating them about the causes and effects of water pollution.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
By ensuring that 100% of the complaints received by the City are investigated and resolved as necessary, the City ensures that this BMP is effective in reducing pollution to stormwater.

-END-

G. Best Management Practice (BMP) #7 – Water Quality Sampling Program

1. Description of BMP:

The City has developed a water quality sampling program that was implemented in 2002. The program is designed to examine general water quality trends over time. Currently the program monitors 22 individual sites around the City for various water quality, insitu and biologic parameters.

Water quality parameters – Fecal coliform, *E. coli*, BOD, COD, TKN, Ammonia, Nitrite, Nitrate, Ortho-phosphate, Total Phosphorus, TSS,
Metals – Zinc, Cadmium, Copper, Lead and Hardness
In-situ parameters – Temperature (Air and Water), DO, turbidity, conductivity, and pH
Biological sampling – Three macroinvertebrate species

Sampling, for the quality parameters above, are conducted over the span of 12 sampling events. These 12 events are conducted at six sites and are divided into four distinct phases; winter monitoring, spring monitoring, summer monitoring and fall monitoring. A wet weather event (sample is taken within 24 hours of a rain event greater than 0.1") is completed at least once during the winter and summer phases. A dry weather event (sample is taken after 72 hours with no rain event over 0.1") is also completed at least once during the spring and fall phases. Additionally, 16 sites are monitored once a week for the whole year for in-situ parameters.

Ultimately, this program will establish whether activities within the watersheds are detrimental to the health of the stream and if illicit discharges are occurring within the streams. In addition should results for metals be higher than the standards set forth by the EPD *Rules and Regulations for Water Quality Control,* a second sample will be taken as soon as possible. Should the second sample exceed standards as well, a source tracing event will be initiated using procedures established in this NOI.

2. Measurable Goals:

a. Six sites are sampled for all parameters each year
b. Sixteen sites are monitored once a week each year for in-situ parameters
c. Annually analyze data is to look for water quality trends and report on analysis in the Annual Report

3. Documentation to be submitted with annual report: Annual water quality sampling report, water quality trend discussion, laboratory testing results when necessary, source tracing documentation when necessary

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions: Sampling and analysis – Yearly

   c. Month/Year of each action: 2013, 2014, 2015, 2016, 2017

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
   Conducting annual water quality test will help us to more easily recognize changes in the watershed throughout the community. Overall this BMP will help to trace illicit discharges throughout the City.

7. Determination of BMP effectiveness in reducing pollution to stormwater
   The City believes that sampling for various chemical, bacteria and in-situ water quality parameters throughout the year will help in identifying and reducing pollution in the City's streams.

-END-

MINIMUM CONTROL MEASURE D
CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

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

A. An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance;

B. Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;

C. Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site that may cause adverse impacts to water quality;

D. Procedures for site plan review which incorporate consideration of potential water quality impacts;

E. Procedures for receipt and consideration of information submitted by the public; and

F. Procedures for site inspection and enforcement of control measures.

The following Best Management Practices are included as part of this Minimum Control Measure:

- BMP #1 – E & S Ordinance Review
- BMP #2 – Site Plan Review
- BMP #3 – Inspection Program
- BMP #4 – Citizen Complaint Response
- BMP #5 – GSWCC Certification

A. Best Management Practice (BMP) #1 – E & S Ordinance Review

1. Description of BMP:

   Peachtree City is an Issuing Authority and remains in compliance with the Georgia Erosion and Sediment Control Act (GESA) of 1975 as amended. Accordingly, the City continues to implement and enforce an E&S Ordinance designed to require erosion and sediment controls at construction sites and imposes sanctions for failure to comply with the ordinance.

   In addition, the City's Water Resource Protection Ordinance contains a litter provision that requires the proper management of materials commonly found on construction sites such as oil and fluids, gasoline, concrete washout, sanitary waste, etc. and imposes sanctions for failure to comply with the ordinance.

2. Measurable Goals:
   a. Evaluate the City's Erosion and Sedimentation Control Ordinance to determine if revisions are necessary to further ensure compliance
   b. Evaluate the litter provisions of the City's Water Resource Protection Ordinance to determine if revisions are necessary to further ensure compliance
   c. Modify the City's Erosion and Sedimentation Control Ordinance as necessary and implement the revisions. Forward a copy of the revised ordinance to EPD.
   d. Modify the litter provisions of the City's Water Resources Protection Ordinance as necessary and implement the revisions. Forward a copy of the revised ordinance to EPD.
   e. Report the results of the Ordinance reviews to EPD in the Annual Report

3. Documentation to be submitted with each annual report: Discussion of ordinance reviews, copy of revised ordinance / ordinances when necessary

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Evaluate the E&S Ordinance - Annually
      ii. Evaluate the litter provisions of the Water Resources Protection Ordinance - Annually
      iii. Modify the E&S Ordinance and implement the revisions – As necessary

iv. Modify the litter provisions of the Water Resources Protection Ordinance and implement the revisions – As necessary
v. Report Ordinance review results to EPD in Annual Report - Annually

c. Month/Year of each action:
i. Dec 2013, 2014, 2015, 2016, 2017– Evaluation of the E&S Ordinance and litter provisions of the Water Resources Protection Ordinance

5. Person (position) responsible for overall management and implementation of the BMP: David Borkowski (City Engineer); Michael Madison (Stormwater Project Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
A regulatory mechanism is necessary to require erosion and sediment controls at construction sites and to impose sanctions in order to ensure compliance.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
Through the process of annually evaluating the Ordinances, revising the Ordinances as necessary and reporting on the results of the evaluation to EPD, the City can ensure that this BMP is effective in reducing pollution to stormwater.

-END-

B. Best Management Practice (BMP) #2 – Site Plan Review

1. Description of BMP:
   Peachtree City is an Issuing Authority and remains in compliance with the Georgia Erosion and Sediment Control Act (GESA) of 1975 as amended. Accordingly, all developers are required to comply with the City's 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.

   Erosion, Sedimentation and Pollution Control Plans (ESPCP) are submitted to the City in a LDA Permit application. ESPCP plans are reviewed by GSWCC certified City staff against the E&S Ordinance and approved plan review checklists. Once an ESPCP is approved, the developer is issued an LDA Permit by the City and can commence with land disturbing activities. Copies of the approved plan review checklists have been included in Attachment D of this SWMP.

2. Measurable Goals:
   a. Review 100% of ESPCPs for compliance with GESA and the City's Erosion and Sedimentation Control Ordinance
   b. 100% Land Disturbing Activities Permits are granted only after ESPCP is approved
   c. Record number of plans reviewed and approved annually
   d. Report numbers of plans reviewed and approved in annual report

3. Documentation to be submitted with each annual report: Plan review and LDA permit logs

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Review ESPCP – For each plan submitted
      ii. Issue Land Disturbing Activities Permits – For all approved ESPCPs
      iii. Record number of plans reviewed and approved – Annually
      iv. Report numbers of plans reviewed and approved - Annually

   c. Month/Year of each action:

i. Ongoing 2013, 2014, 2015, 2016, 2017– ESPCP review and approval

5. Person (position) responsible for overall management and implementation of the BMP: David Borkowski (City Engineer)

6. Rationale for choosing BMP and setting measurable goal(s):
The City is performing this effort as part of its responsibility as an Issuing Authority. The plan review and LDA permit issuance process ensures that effective erosion control measures are in place to prevent sediment transport from construction sites to the City's MS4.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
By reviewing 100% of all ESPCPs for compliance with GESA and the City's E & S Ordinance and issuing LDP's to only those sites that received ESPCP approval, the adverse impacts to water quality resulting from sediment transport and deposition can be prevented. Hence, this BMP is effective in reducing pollution to stormwater.

-END-

C. Best Management Practice (BMP) #3 – Inspection Program

1. Description of BMP:

To ensure that all erosion and sediment control BMP's are implemented in accordance with the sites approved ESPCP, the City inspects all construction sites for compliance. Prior to issuing any LDA Permit, the City inspects construction sites to ensure compliance with the site's approved initial phase ESPCP plan. If the site conforms to the initial phase plan, the City then issues the LDA permit and clearing activities are permitted. All construction sites are inspected shortly after land disturbing activities have commenced to ensure that all E&S BMPs are implemented and functioning properly. Weekly inspections will take place after that based on the following priorities:

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

In addition to the weekly inspection schedule, all construction sites will be inspected within 24 hours of a 0.5 inch or greater rainfall event. All construction sites are inspected after construction activity has ceased to ensure that the site has been properly stabilized. During site inspections, City staff will check for compliance with the approved ESPSP, Peachtree City's E&S Ordinance, with the "litter" provision of the Water Resources Protection Ordinance and with the illicit discharge provision of the Water Resources Protection Ordinance.

These provisions allow City staff to require and enforce the proper management of materials commonly found on construction sites such as oil and fluids, gasoline, concrete washout, sanitary waste, etc. A log of all inspections is maintained by the City.

If upon inspection, a site is found to be in non-compliance, the contractor will be notified at the time of inspection. The contractor will be provided with a copy of the written 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 compliance has been achieved. If, upon the second inspection, a construction site is found to still be out of compliance with the approved ESPCP plan, the site will be considered in violation and the responsible

person could be issued a stop-work order and given a citation. Upon the third violation, the responsible person may forfeit their bond. The E&S ordinance also allows for City staff to issue immediate stop work orders in emergency situations.

2. Measurable Goals:
   a. 100% of construction sites with LDA permits will be inspected at the start of land disturbing activities
   b. 100% of construction sites with LDA permits will be inspected at the close of land disturbing activities
   c. Inspect 100% of construction sites with LDA permits on a weekly basis
   d. Inspect 100% of construction sites with LDA permits within 24 hours of a 0.5 inch or greater rainfall event
   e. 100% of construction sites found to be in noncompliance with their ESPCP will receive written notification of their violation
   f. 100% of construction sites that are found to be in noncompliance will be reinspected to ensure that appropriate measures are implemented
   g. 100% of records from inspections entered into City E&S log
   h. Provide documentation of E&S inspections and any enforcement actions in the annual report

3. Documentation to be submitted with each annual report: Inspection log, inspection checklists, copies of stop work orders, notices of violation, copies of citations

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Inspections – Conducted as described above
      ii. Provide documentation of E&S inspections and any enforcement actions in the annual report - Annually

   c. Month/Year of each action:
      i. Ongoing 2013, 2014, 2015, 2016, 2017 – Inspections conducted as described above

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager); Ursula Todd (Development Inspector)

6. Rationale for choosing BMP and setting measurable goal(s):
   The City is performing this effort as part of its responsibility as an Issuing Authority under the State's Erosion and Sedimentation Act.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   By inspecting all active construction sites to ensure compliance with approved ESPCP's and ensuring that 100% of all enforcement activities are successful, the adverse impacts to water quality resulting from sediment transport and deposition can be prevented. Hence, this BMP is effective in reducing pollution to stormwater

-END-

D. Best Management Practice (BMP) #4 – Citizen Complaint Response

1. Description of BMP:
   The City has created a citizen compliant contact number so citizens can report erosion control violations. The complaint calls are answered by a City staff member who forwards the complaint to the appropriate City department. If necessary, the complaint will be forwarded to the appropriate State or Federal department (if it is not within the City's jurisdiction). The date, time, location, and nature of the complaint as well as any other pertinent information is logged into an electronic database. In addition to the complaint phone number, residents can also file an electronic complaint via an online complaint form located on the City's webpage.

   Once the call or online complaint has been forwarded to the appropriate department, City staff within that department is responsible for investigating the complaint and taking any appropriate action including enforcement if necessary. Any complaint resolution actions taken are also entered into the same database.

   The complaint contact number and online complaint form is publicized on the City's website, the stormwater management webpage and the public works webpage.

2. Measurable Goals:
   a. Continuous update of complaint database
   b. City staff addresses 100% of calls received
   c. City staff investigates 100% of reasonable calls within five working days
   d. City staff takes appropriate action for 100% of complaints that require it
   e. Report number of complaints received and status of complaint in annual report

3. Documentation to be submitted with each annual report: Complaint database, copies of work orders generated by specific complaints, screenshot of website complaint form

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Database update – As calls are received
      ii. Complaint investigation – As calls are received

iii. Report number of complaints received and status of complaint in annual report - Annually

c. Month/Year of each action:
   i. Ongoing: 2013, 2014, 2015, 2016, 2017 – Investigation of complaints

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

6. Rational for choosing BMP and setting measurable goals:
The citizen complaint contact number and online complaint form provide a way for City, residents to be an "auxiliary" inspection force ensuring that potential water quality violations are being investigated. This BMP is also intended to engage citizens in local water resources protection thereby educating them about the causes and effects of water pollution.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
By tracking all of the E&S related citizen complaints and ensuring that 100% of the complaints are resolved, the City can ensure that adverse impacts to water quality resulting from sediment transport and deposition can be prevented. Hence, this BMP is effective in reducing pollution to stormwater.

-END-

E. Best Management Practice (BMP) #5 – GSWCC 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 requires all of its E&S inspectors and plan reviewers receive this training. The City also requires all construction site operators working within the city limits receive this training.

2. Measurable Goals:
   a. Ensure that all City staff involved in site inspection and plan review activities are GSWCC certified and maintain that certification
   b. Provide the number and type of current certifications held by City staff in the annual report.
   c. Ensure that all construction site operators have received the appropriate GSWCC certification

3. Documentation to be submitted with each annual report: Copies of staff certification cards, tabulation of staff certifications

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Certify or recertify staff - Annually
      ii. Report number and types of GWSCC certified staff in annual report - Annually

   c. Month/Year of each action:
      i. Ongoing: 2013, 2014, 2015, 2016, 2017 – GWSCC Certification

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

6. Rational for choosing BMP and setting measurable goals:
   City staff and construction site operators who are properly trained in E&S requirements can provide a significant safeguard against potential water quality impacts that result from transport and deposition of sediment from construction sites.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   By ensuring that all City staff involved in site inspection and plan review activities are GSWCC certified and maintain that certification and requiring that all construction site operators are properly trained in E&S requirements, this BMP can provide a significant safeguard against potential water quality impacts. Hence, this BMP is effective in reducing pollution to stormwater.

-END-

MINIMUM CONTROL MEASURE E
POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

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

Develop and implement strategies that include a combination of structural and/or non structural BMP's appropriate for your community;

Use an ordinance or other regulatory mechanism to address post-construction runoff from new development or redevelopment projects; and

Ensure adequate long-term operation and maintenance of BMP's.

The following Best Management Practices are included as part of this Minimum Control Measure:

BMP #1 – Stormwater Management in New Development and Redevelopment Ordinance Review
BMP #2 – Detention Pond Mapping and Database
BMP #3 – Detention Pond Inspection Program
BMP #4 – Detention Pond Maintenance Program
BMP #5 – Green Infrastructure/Low Impact Development

A. Best Management Practice (BMP) #1 – Stormwater Management in New Development and Redevelopment Ordinance Review

1. Description of BMP:
   The City has developed and continues to implement and enforce a Post Development Stormwater Management in New Development and Redevelopment Ordinance designed to control the adverse effects of increased post development stormwater runoff and nonpoint source pollution associated with new development and redevelopment projects. In addition to mandating the use of the GSMM and Local Design Manual, the Ordinance also contains provisions for long term maintenance of BMP's.

2. Measurable Goals:
   a. Evaluate the City's Post Construction Stormwater Management in New Development and Redevelopment Ordinance to determine if revisions are necessary to further ensure compliance
   b. Modify the City's Post Construction Stormwater Management in New Development and Redevelopment Ordinance as necessary and implement the revisions. Forward a copy of the revised ordinance to EPD.
   c. Report the results of the Ordinance review to EPD in the Annual Report

3. Documentation to be submitted with each annual report: Discussion of ordinance review, copy of revised ordinance when necessary

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Evaluate the Ordinance – Annually
      ii. Modify the Ordinance and implement the revisions – As necessary
      iii. Report Ordinance review results to EPD in Annual Report

   c. Month/Year of each action:
      i. Dec 2013, 2014, 2015, 2016, 2017– Evaluation of the Post Construction Stormwater Management in New Development and Redevelopment Ordinance

5. Person (position) responsible for overall management and implementation of the BMP: David Borkowski (City Engineer); Michael Madison (Stormwater Project Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
A regulatory mechanism is necessary to control the adverse effects of increased post development stormwater runoff and nonpoint source pollution associated with development and redevelopment, to ensure maintenance of BMP's and to impose sanctions in order to ensure compliance.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
Through the process of annually evaluating the Ordinance, revising the Ordinance as necessary and reporting on the results of the evaluation to EPD, the City can ensure that this BMP is effective in reducing pollution to stormwater.

-END-

B. Best Management Practice (BMP) #2 – Detention Pond Database and Mapping

1. Description of BMP:
   The City has previously developed and currently maintains a database and map of all BMPs within the city limits. The database identifies the location of the BMP, type of ownership (municipal or private), and other pertinent data. As new BMPs are accepted by the City, the database and map are updated. As stated in Table 4.2.5(a) of the General NPDES Stormwater Permit, the City will revise the database and map to include all municipally owned BMPs and only those privately owned BMPs designed after the December 9, 2008 deadline for adoption of the GSMM.

2. Measurable Goals:
   a. Revise BMP database and map
   b. Update database as new BMPs are accepted

3. Documentation to be submitted with each annual report: Updated detention pond map, updated detention pond inventory

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Database update - Annually

   c. Month/Year of each action:
      i. June 2013 – Revise database and map
      ii. Ongoing 2013, 2014, 2015, 2016, 2017 – Update database and map

5. Person (position) responsible for overall management and implementation of the BMP: Mr. Michael Madison (Stormwater Manager) ; Mr. Tony Whitley (GIS Coordinator)

6. Rationale for choosing BMP and setting measurable goal(s):
   In order to aid in the City's BMP Inspection and Maintenance program, the City must update our database as new BMP locations and ownership come online.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   The City believes that detention ponds, water quality ponds and other BMPs are effective tools for reducing pollution to stormwater.

By ensuring that the City is aware of the locations and ownership of all BMPs within the City limits, the City is able develop an effective BMP inspection and maintenance program. Hence, this BMP is effective in reducing pollution to stormwater.

-END-

C. Best Management Practice (BMP) #3 – Detention Pond Inspection Program

1. Description of BMP:
   The City continues to implement a BMP inspection program. All BMP's identified in the database developed as part of Minimum Control Measure E BMP #2 will be subject to inspection. The City has five major watersheds; Camp Creek, Lake Kedron, Lake Peachtree, Line Creek and Lower Flat Creek. All BMPs within one watershed will be inspected on an annual basis and the watersheds will rotate from one year to the next. This inspection schedule will ensure that all BMPs in the database will be inspected at least once during the five year NPDES Phase II Permit cycle. The inspections will utilize the previously approved inspection checklist. A copy of the inspection checklist and sector map has been included in Attachment E of this SWMP.

   For those BMPs that are not included on the database developed as part of Minimum Control Measure E BMP #2, the City will inspect these BMPs on an as needed basis such as in response to a citizen complaint or a visual observation by city personnel of a deficiency associated with the BMP. These 'as needed' inspections will also utilize the approved inspection checklist.

2. Measurable Goal(s):
   a. Inspect 100 % of BMPs in specified watershed
   b. Rotate watersheds annually
   c. Inspect BMPs on an as needed basis

3. Documentation to be submitted with each annual report: Detention pond inspection sector map, completed inspection checklists,

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Inspections – One watershed annually

   c. Month/Year of each action:
      i. 2013 – Lake Kedron Watershed BMPs
      ii. 2014 – Lake Peachtree Watershed BMPs
      iii. 2015 – Camp Creek Watershed BMPs
      iv. 2016 – Line Creek Watershed BMPs
      v. 2017 – Lower Flat Creek Watershed BMPs

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
Efficiently operating BMPs can mitigate the effects of downstream flooding and potential pollution of stormwater. As such, implementing this program will ensure that BMPs are functioning adequately to treat water quality and quantity.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
The City believes that detention ponds, water quality ponds and other BMPs are effective tools for reducing pollution to stormwater. By routinely inspecting BMPs, the can ensure that the BMPs are operating efficiently and that this BMP is effective in reducing pollution to stormwater.

-END-

D. Best Management Practice (BMP) #4 – Detention Pond Maintenance Program

1. Description of BMP:

Efficiently operating BMPs can reduce the effects of downstream flooding as well as enhance water quality. As such, the City will continue to implement this program to ensure that BMPs are functioning adequately to treat water quality and quantity. If the BMP inspection process detailed in Minimum Control Measure E BMP #3 results in the determination that a BMP is in need of some degree of maintenance, the City will address it as follows:

Municipally Owned BMPs

Maintenance of municipally owned BMP's will be performed by the City's public works department and may include, but is not limited to, removal of debris, litter, sediment; outfall repairs, bank stabilization and weir maintenance. A work order for the maintenance activity will be generated and the progress of the work will be tracked until it has been completed. Upon completion of the maintenance work, the work order will then be closed.

Privately owned BMPs

Maintenance of privately owned BMPs will remain the responsibility of the private owner. The City will work with the owners of privately owned BMPs to help them understand their maintenance responsibilities. Following the identification of maintenance deficiencies through the BMP inspection process, the City will issue the BMP owner a written letter detailing the problem and specifying any necessary remedial action. In addition, the letter will also specify a maximum duration for accomplishing the maintenance. The letter will be supported by a copy of the inspection checklist. The City will track the maintenance activities until complete. In the event that the private owner does not comply, the City's post development stormwater ordinance provides the legal enforcement necessary to ensure private owner compliance.

In addition, the City will continue to require the owners of newly constructed privately owned BMP's to enter into an maintenance agreement with the City that ensures the private owners will maintain their stormwater BMP's. The maintenance agreement is part of the project permitting process and an LDA permit is not issued until a signed agreement is received by the City.

For BMPs that did not meet the requirement for inclusion into the BMP database developed as part of Minimum Control Measure E

BMP #2, but were inspected on an as needed basis (see Minimum Control Measure E BMP #3,) the maintenance protocol for these BMPs will be same as privately owned BMPs.

2. Measurable Goal(s):
   a. Maintain 100 % of municipally owned BMPs and track until complete
   b. Notify 100% of private BMPs owners of maintenance requirements and track until complete

3. Documentation to be submitted with each annual report: Maintenance letters to pond owners, re-inspection and maintenance acceptance letter, detention pond maintenance tracking log

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Maintenance – As needed

   c. Month/Year of each action:
      i. BMP Maintenance – Ongoing 2013, 2014, 2015, 2016, 2017

5. Person (position) responsible for overall management and implementation of the BMP: Mr. Michael Madison (Stormwater Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
   The City believes that efficiently operating BMPs can reduce downstream flooding issues and enhance water quality. As such, continuing to implement a BMP maintenance program ensures that BMPs are functioning to adequately treat water quality and quantity.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   By performing BMP maintenance and tracking the maintenance activities until complete, the City can conclude that this BMP is effective in reducing stormwater pollution.

-END-

E. Best Management Practice (BMP) #5 – Green Infrastructure/Low Impact Development

1. Description of BMP:
   The City will develop an inventory of water quality-related Green Infrastructure/ Low Impact Development (GI/LID) structures. At a minimum, the inventory will include bioswales, pervious pavements, rain gardens, cisterns, green roofs and any other structure deemed appropriate by the City. The initial inventory will be reported in a table format and will include summary of the total number of each structure. The inventory must be submitted to EPD by February 15, 2014.

   In addition to the development of the GI/LID inventory, the City will also 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. The review will utilize the Center for Watershed Protection's Code and Ordinance Worksheet. The completed worksheet shall be submitted to EPD for review by February 15, 2015 and with the 2014 Annual Report. Any ordinance revisions resulting from the review must be completed and adopted December 6, 2016.

2. Measurable Goal(s):
   a. Develop an inventory of all GI/LID structures in the City.
   b. Submit inventory to EPD with annual report
   c. Update the inventory once per year
   d. Review ordinances, codes, etc for GI/LID impedance
   e. Revise ordinances as necessary

3. Documentation to be submitted with each annual report: Updated GI/LID inventory, code and ordinance worksheet, revised ordinance as necessary

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Develop and update GI/LID inventory – Annually

   c. Month/Year of each action:
      i. Dec 2013 – Develop Inventory
      ii. Dec 2014, 2015, 2016, 2017 – Update Inventory
      iii. Feb 2015 – Ordinance review
      iv. Dec 2016 – Ordinance revisions as necessary

5. Person (position) responsible for overall management and implementation of the BMP: Mr. Michael Madison (Stormwater Manager)

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. Determination of BMP effectiveness in reducing pollution to stormwater:
The City believes that GI/LID structures enhance water quality and thereby reduce pollution to stormwater. By developing and annually updating an inventory of these types of structures, the City can (1) ensure that the locations of these structures are known and (2) the City can ensure that long term maintenance of these structures is performed. By reviewing and if necessary, revising building codes, ordinances and other regulations, the City can to ensure the codes and ordinances do not prohibit or impede the use of GI/LID practices. Hence, this BMP is effective in reducing pollution to stormwater.

-END-

MINIMUM CONTROL MEASURE F
POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

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

The following Best Management Practices are included as part of this Minimum Control Measure:

BMP #1 – MS4 Inventory and Mapping Program
BMP #2 – MS4 Inspection Program
BMP #3 – MS4 Maintenance Program
BMP #4 – Street Sweeping Program
BMP #5 – Employee Training Program
BMP #6 – Waste Disposal Program
BMP #7 – New Flood Management Projects
BMP #8 – Existing Flood Management Projects
BMP #9 – Municipal Facility Inspection Program
BMP #10 – Roadside Litter Pickup Program
BMP #11 – Recycling Program

A. Best Management Practice (BMP) #1 – MS4 Inventory and Mapping Program

1. Description of BMP:
   The City will continue to maintain a GIS based map and inventory of all MS4 components owned or maintained by the City. 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
   - Headwall and other Pipe end Treatments
   - Storm Drain Pipes
   - Ditches / Swales
   - Detention / Retention ponds

   As part of the inventory and MS4 map, the City will include a summary of the totals of each MS4 component. Each year, the City will update the inventory and map as new structures are added or existing structures are removed or replaced. 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):
   a. Provide an updated MS4 Control Structure Inventory & Map with each annual report

3. Documentation to be submitted with each annual report: Updated MS4 map, updated MS4 inventory, tabulation of newly added or removed structures

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Annual

   c. Month/Year of each action:
      i. December 2013,2014,2015,2016,2017 – Updated MS4 Control Structure Inventory & Map

5. Person (position) responsible for overall management and implementation of the BMP: Mr. Michael Madison (Stormwater Manager)

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. Peachtree City also utilizes the map / inventory as a critical management tool to addressing infrastructure needs within the Community.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   It is the intent of the BMP to protect existing water quality by ensuring that City staff is aware of all City owned and maintained storm drainage infrastructure. This awareness will aid the City in ensuring the long term maintenance of the system.

-END-

B. Best Management Practice (BMP) #2 – MS4 Inspection Program

1. Description of BMP:
   The City will continue to implement an MS4 inspection program. The City has been divided into 5 sectors. One sector will be inspected annually and then rotate to another sector the following year. This inspection schedule will result in 100% of the MS4 being inspected during the 5 year permit cycle. The MS4 will be inspected for evidence of sedimentation, debris, or structural defects and will utilize the previously approved MS4 inspection checklist. A copy of the inspection checklist and MS4 inspection sector map is included in Attachment F. Each year, the results of inspection will be recorded in a table format and provided in the annual report for that year.

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

2. Measurable Goal(s):
   a. Inspect the MS4 within one sector annually

3. Documentation to be submitted with each annual report: Inspection sector map, inspection checklists

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. MS4 inspection - Annually

   c. Month/Year of each action:
      i. 2013 – Inspect all MS4 Structures in Sector 1
      ii. 2014 – Inspect all MS4 Structures in Sector 2
      iii. 2015 – Inspect all MS4 Structures in Sector 3
      iv. 2016 – Inspect all MS4 Structures in Sector 4
      v. 2017 – Inspect all MS4 Structures in Sector 5

5. Person (position) responsible for overall management and implementation of the BMP: Mr. Michael Madison (Stormwater Manager)

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 number of MS4 structures, the City will ensure that over the course of the permit, the entire MS4 will be inspected.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   It is the intent of the 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.

-END-

C. Best Management Practice (BMP) #3 – MS4 Maintenance Program

1. Description of BMP:

The City will continue to implement an MS4 maintenance program. Maintenance activities will be based on the deficiencies identified during the MS4 inspection program developed in Minimum Control Measure F BMP #2. Maintenance activities will be prioritized to coincide with the inspection sectors identified in BMP #2 but will also be based on citizen complaints received via various reporting avenues as well as identification of maintenance needs by city personnel. Once a maintenance issue has been identified, it will be addressed as follows:

In-House Maintenance

Routine maintenance such as sediment and debris removal, repair of MS4 structures, small to medium scale pipe replacement / repair and other maintenance items that the City is capable of performing in-house will be performed by the City's public works department. A work order for the maintenance activity will be generated and the progress of the work will be tracked until it has been completed. Upon completion of the maintenance work, the work order will then be closed.

Contracted Maintenance/CIP List

MS4 maintenance projects that are beyond the abilities of the City's public works department will be contracted out to qualified contractors or placed on the City's Capital Improvements Projects (CIP) list until funds become available to perform the work. These outsourced projects may include large scale replacement projects, pipe lining projects, closed circuit TV and pipe jetting services.

The City will track all maintenance activities and report on the maintenance activities in the annual report.

2. Measurable Goal(s):
   a. Maintain the MS4 as required
   b. Track all maintenance activities

3. Documentation to be submitted with each annual report: Contracted work summary, MS4 maintenance log, drainage complaint log, MS4 work orders

4. Schedule:
   a. Implementation Date: Jan 2013
   b. Frequency of actions:

i. MS4 Maintenance – Annually

c. Month/Year of each action:
   i. Sector 1 MS4 Maintenance - 2013,
   ii. Sector 2 MS4 Maintenance – 2014
   iii. Sector 3 MS4 Maintenance – 2015
   iv. Sector 4 MS4 Maintenance – 2016
   v. Sector 5 MS4 Maintenance – 2017
   vi. Complaint Driven Maintenance - On-going 2013, 2014, 2015, 2016, 2017

5. Person (position) responsible for overall management and implementation of the BMP: Mr. Michael Madison (Stormwater Manager)

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

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   It is the intent of the 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.

-END-

D. Best Management Practice (BMP) #4 – Street Sweeping Program

1. Description of BMP:
   In an effort to remove pollutants, litter and debris from City roadways before they can enter the MS4, the City will continue to sweep all major intersections with curb and gutter and municipal parking lots on a monthly basis. The City has prioritized these locations because of the high traffic volume they receive and the tendency for litter and debris to collect in these areas. The specific intersections and municipal parking lots that will be swept are detailed on the Street Sweeping Inventory attached to this SWMP in Attachment F.

   All other streets within the City will be swept on an as needed basis in response to a request from a resident or in response to a visual observation by a city employee. All debris and litter removed will be disposed of at a local landfill. The total quantity of litter and debris removed during the year will be tracked and recorded.

2. Measurable Goals:
   a. Sweep major intersections with curb and gutter on a monthly basis
   b. Sweep municipal parking lots on a monthly basis
   c. Sweep all other streets on a as needed basis

3. Documentation to be submitted with each annual report: Street sweeping log, municipal parking lot inventory, intersection inventory

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of Action: Street sweeping – Monthly

   c. Month/year of each action: 2013, 2014, 2015, 2016, 2017– Monthly street sweeping

5. Person (position) responsible for overall management and implementation of the BMP: Mr. Michael Madison (Stormwater Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
   A routine street sweeping program can be very effective in removing pollutants, litter and debris from roadways before it enters the City's MS4.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   By quantifying and recording the amounts of trash and debris picked up annually by the sweeping program, the City can conclude that the trash and debris was prevented from entering the City's MS4 and thereby reduced a contributing factor to stormwater pollution.

-END-

E. Best Management Practice (BMP) #5 – Employee Training Program

1. Description of BMP:
   The City continues to implement a training program for new and existing employee's that teaches proper handling, storage and disposal methods for potentially polluting materials commonly encountered by the staff. The training program also includes information on regulatory issues as well as spill prevention and control. Training sessions will be held annually for all employees. New employees will be trained within 30 days of hiring. The number of employees trained every year will be documented through the use of sign in sheets. A copy of the employee training program is attached to this SWMP in Attachment F.

2. Measurable Goal(s):
   a. Conduct annual training for all employees

3. Documentation to be submitted with each annual report: Training session sign in sheet, training materials

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Training sessions for existing employees – Annually
      ii. Training session for new employees – Within 30 days of hire and then annually

   c. Month/Year of each action:
      i. Nov 2013, 2014, 2015, 2016, 2017 – Hold training session

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
   The City believes that the staff should have adequate training in the handling of hazardous materials to reduce the potential that these materials will be accidentally discharged into the MS4.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   By using training session sign in sheets to verify that 100% of all employees that come in contact with potentially polluting materials

are annually trained, the City can conclude that this BMP is effective in reducing pollution to stormwater.

-END-

F. Best Management Practice (BMP) #6 – Waste Disposal Program

1. Description of BMP:
   The City is committed to properly disposing of all waste generated during municipal maintenance activities such as street sweeping, litter pickup, BMP maintenance and maintenance of the MS4. Whenever possible, waste items such as glass, plastic bottles, ferrous metals and aluminum cans will be recycled. Waste that cannot be recycled will be disposed of in a landfill in accordance with the rules and regulations of that facility. If necessary, material will be disposed of as hazardous waste. The City will track and record the quantities of waste properly disposed on an annual basis.

2. Measurable Goal(s):
   a. Properly dispose of 100% of waste generated by municipal operations

3. Documentation to be submitted with each annual report: Waste tonnage summary, screenshot of waste disposal webpage

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions: Properly dispose of waste - Annually

   c. Month/Year of each action:
      i. 2013, 2014, 2015, 2016, 2017 – Dispose of municipal waste properly

5. Person (position) responsible for overall management and implementation of the BMP: Mr. Michael Madison (Stormwater Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
   The purpose of this BMP will be to ensure proper disposal of municipal maintenance waste materials

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   By quantifying and recording the amounts of MS4 maintenance related waste annually, the City can conclude that the waste was prevented from entering the City's MS4 and thereby reduced a contributing factor to stormwater pollution.

-END-

G. Best Management Practice (BMP) #7 – New Flood Management Projects

1. Description of BMP:
   All proposed flood management projects undertaken by the City will be assessed for water quality impacts and the feasibility of incorporating water quality enhancements into the proposed project. The assessment will occur during the project design phase and will utilize the previously approved assessment checklists. The number of projects assessed annually will be tracked.

2. Measurable Goal(s):
   a. Use checklist on 100% of future flood management designs

3. Documentation to be submitted with each annual report: Completed flood management assessment checklist

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Analyze all future City flood management projects – As necessary

   c. Month/Year of each action:
      i. 2013, 2014, 2015, 2016, 2017 – Analyze all future City flood management projects for water quality impacts

5. Person (position) responsible for overall management and implementation of the BMP: Mr. David Borkowski (City Engineer)

6. Rationale for choosing BMP and setting measurable goal(s):
   The City anticipates that a number flood management projects will be undertaken by the City through the Stormwater Utility. As such, this BMP will allow the City numerous opportunities to incorporate water quality considerations into the ongoing design work.

7. Determination of BMP effectiveness in reducing pollution to stormwater:

   By ensuring that all proposed City flood management projects are assessed for water quality impacts and the feasibility of incorporating water quality enhancements into the project, the City can conclude that, if feasible, the inclusion of water quality enhancements into the project reduced stormwater pollution.

-END-

H. Best Management Practice (BMP) #8 – Existing Flood Management Projects

1. Description of BMP:
   The City will assess one existing publicly owned flood management structure annually for potential retrofitting to address water quality impacts and the feasibility of incorporating water quality enhancements. The assessment will utilize the previously approved assessment checklists.

2. Measurable Goal(s):
   a. Assess one existing City owned flood management structure annually for water quality retrofit

3. Documentation to be submitted with each annual report: Completed retrofit analysis checklist

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Analyze one existing flood management structure for water quality retrofit - Annually

   c. Month/Year of each action:
      i. 2013, 2014, 2015, 2016, 2017 – Analyze one existing flood management structure for retrofit potential

5. Person (position) responsible for overall management and implementation of the BMP: Mr. David Borkowski (City Engineer)

6. Rationale for choosing BMP and setting measurable goal(s):
   This BMP will allow the City an opportunity to assess existing flood management structures for retrofit potential to enhance water quality.

7. Determination of BMP effectiveness in reducing pollution to stormwater:

   By ensuring that at least one existing flood management structure is assesses for a potential to incorporate a water quality components into a flood management structure that may not currently contain a water quality component, the City can conclude that, if feasible, the inclusion of water quality enhancements into the existing flood management structure reduced stormwater pollution.

-END-

I. Best Management Practice (BMP) #9 – Municipal Facility Inspection Program

1. Description of BMP:
   The City will develop a municipal facility inventory that lists City owned facilities which have the potential to contribute to stormwater pollution. Following development of the facility inventory, the City will begin visually inspecting each of the listed facilities on a quarterly basis. The inspection process will utilize the checklist included in Attachment F of this SWMP. Any deficiencies noted during the quarterly inspections will be addressed within 30 days. The facility will then be reinspected to ensure the deficiency was corrected.

2. Measurable Goal(s):
   a. Develop an municipal facility inventory of all facilities with the potential to contribute to stormwater pollution
   b. Inspect each facility on a quarterly basis
   c. Correct any identified deficiencies within 30 days and reinspect

3. Documentation to be submitted with each annual report: Completed facility inspection checklists, municipal facility inventory

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Inspect each facility listed on the facility inventory - Quarterly

   c. Month/Year of each action:
      i. Jun 2013 – Develop municipal facility inventory
      ii. 2013, 2014, 2015, 2016, 2017 – Quarterly inspections

5. Person (position) responsible for overall management and implementation of the BMP: Michael Madison (Stormwater Manager)

6. Rationale for choosing BMP and setting measurable goal(s):
   The City believes that some municipal facilities may have a higher than average potential for pollutant discharge to downstream water bodies. As such, the City will routinely inspect these facilities to ensure they are not acting as stormwater pollutant sources.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   Through documented routine inspections of municipal facilities, potential stormwater pollution sources can be identified and corrected to lessen the risk of causing downstream pollution. Hence, this BMP is effective in reducing pollution to stormwater.

-END-

J. Best Management Practice (BMP) #10 – Roadside Litter Pickup Program

1. Description of BMP:
   The City contracts Keep Peachtree City Beautiful to provide community service labor to pick up litter and debris from city owned property on a weekly basis. Pickup areas are rotated throughout the city but primarily are concentrated along collector and arterial roads, parks and city facilities. The community service labor also responds to citizen complaints regarding litter and debris along the City's path system. Quantities of litter and debris picked up is tracked and recorded. All trash and debris picked up as part of this program is either disposed of at a local landfill or recycled as appropriate.

2. Measurable Goal(s):
   a. Weekly litter and debris pickups

3. Documentation to be submitted with each annual report: Tabulation of litter collected, community service manhour tabulation

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions: Litter pickup - Weekly

   c. Month/Year of each action: Weekly - 2013, 2014, 2015, 2016, 2017

5. Person (position) responsible for overall management and implementation of the BMP: Mr. Al Yougal (Keep Peachtree City Beautiful)

6. Rationale for choosing BMP and setting measurable goal(s):
   Picking up roadside trash and debris will prevent it from entering the MS4.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
   By quantifying and recording the amounts of trash and debris picked up annually by program, the City can conclude that the trash and debris was prevented from entering the City's MS4 and thereby reduced a contributing factor to stormwater pollution.

-END-

K. Best Management Practice (BMP) #11 – Recycling Program

1. Description of BMP:
   The City contracts Keep Peachtree City Beautiful to operate a recycling center that accepts common recyclable materials such as:

   - Cardboard (corrugated)
   - Magazines
   - Newspapers
   - Aluminum beverage cans
   - Tree trunks - 3" to 12" diameter and 4' maximum length
   - Grass clippings & dried leaves

   Hazardous materials are not accepted. The recycling program is available to all city residents and has two locations within the city limits. Information about the program is advertised on the City's website. Keep Peachtree City Beautiful tracks the volumes of material recycled annually.

2. Measurable Goal(s):
   a. Record the tonnage or volume of each type of material recycled each year and include in annual report
   b. Include and update information on the recycling program on the stormwater website

3. Documentation to be submitted with each annual report: Tonnage or volume of each type of material recycled, screenshot of recycling webpage

4. Schedule:
   a. Implementation Date: Jan 2013

   b. Frequency of actions:
      i. Record tonnage or volume of materials recycled – Annually
      ii. Update information on website – Annually

   c. Month/Year of each action:
      i. Dec: 2013, 2014, 2015, 2016, 2017 – Record amount of material recycled annually
      ii. Mar: 2013, 2014, 2015, 2016, 2017 – Update information on program on website

5. Person (position) responsible for overall management and implementation of the BMP: Mr. Al Yougal (Keep Peachtree City Beautiful)

6. Rationale for choosing BMP and setting measurable goal(s):
Peachtree City currently operates a recycling program for potentially polluting materials that might otherwise end up in the MS4. The City also encourages citizens to recycle.

7. Determination of BMP effectiveness in reducing pollution to stormwater:
By quantifying and recording the amounts of material collected annually for recycling, the City can conclude that some of the material was potentially prevented from entering the City's MS4 and thereby reduced a contributing factor to stormwater pollution.

-END-